

SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN

**THE OHIO VALLEY COAL COMPANY
POWHATAN MINE NO. 6
56854 PLEASANT RIDGE ROAD
ALLEDONIA, OH 43902**

May 2011

Prepared For:

The Ohio Valley Coal Company
Powhatan Mine No. 6
56854 Pleasant Ridge Road
Alledonia, Ohio 43902-9716

Prepared By:

**COMPLIANCE MANAGEMENT
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1.0 FORMAT

To the extent practical, this Spill Prevention Control and Countermeasures (SPCC) Plan follows the outline set forth in 40 CFR Parts 112.7 and 112.8. The requirements of 40 CFR Parts 112.7 and 112.8 are written in italics in this SPCC Plan with responses and discussions written in normal type. Company responses are written directly below regulations or groups of regulations where practical.

2.0 112.3 – REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF SPCC PLANS

The owner or operator of an onshore or offshore facility subject to this section must prepare a Spill Prevention, Control, and Countermeasure Plan (hereafter "SPCC Plan" or "Plan)," in writing, and in accordance with § 112.7, and any other applicable section of this part.

2.1 112.3(d) – Professional Engineer's Certification

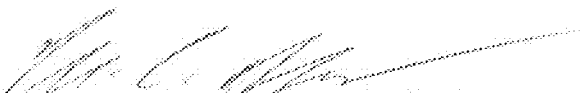
A licensed Professional Engineer (PE) must review and certify a Plan for it to be effective to satisfy the requirements of this part.

I hereby certify that:

- (i) I am familiar with the requirements of 40 CFR Parts 112.7 and 112.8;
- (ii) I and/or my agent has visited and examined the facility;
- (iii) The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part;
- (iv) Procedures for required inspections and testing have been established in the SPCC Plan; and
- (v) The SPCC Plan is adequate for the facility.

Chris C. Maye, PE

PRINTED NAME OF REGISTERED PROFESSIONAL ENGINEER



SIGNATURE OF REGISTERED PROFESSIONAL ENGINEER

REGISTRATION NO.: PE-070759

STATE: Pennsylvania

(SEAL) DATE: 5/24/2011



3.0 112.4 – AMENDMENT OF SPCC PLANS BY REGIONAL ADMINISTRATOR

(a) Notwithstanding compliance with § 112.3, whenever your facility has discharged more than 1,000 U.S. gallons of oil in a single discharge as described in § 112.1(b), or discharged more than 42 U.S. gallons of oil in each of two discharges as described in § 112.1(b), occurring within any twelve month period, submit the following information to the Regional Administrator within 60 days from the time the facility becomes subject to this section:

- (1) Name of the facility;*
- (2) Your name;*
- (3) Location of the facility;*
- (4) Maximum storage or handling capacity of the facility and normal daily throughput;*
- (5) Corrective action and counter-measures you have taken, including a description of equipment repairs and replacements;*
- (6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;*
- (7) The cause of such discharge as described in § 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;*
- (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and*
- (9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.*

If more than 1,000-gallons of oil is discharged into or upon the navigable waters of the United States or adjoining shorelines in a single spill event, or in quantities in two (2) spill events of greater than or equal to 42-gallons of oil occurring within a 12 month period, the United States Environmental Protection Agency (USEPA) shall be notified, as discussed in Section 5.0, and the USEPA Regional Administrator may require The Ohio Valley Coal Company (TOVCC) (hereafter “facility”) to amend this SPCC Plan. Within thirty (30) days of USEPA notice to amend the plan, the PE certified amendment will be submitted to the USEPA.

4.0 112.5 – AMENDMENT OF SPCC PLANS BY OWNERS OR OPERATORS

(a) Owners or operators of facilities subject to this part must amend the SPCC Plan for your facility in accordance with the general requirements in § 112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in § 112.1(b). An amendment made under this section must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.

(b) Notwithstanding compliance with paragraph (a) of this section, complete a review and evaluation of the SPCC Plan at least once every five years from the date your facility becomes subject to this part; or, if your facility was in operation on or before August 16, 2002, five years from the date your last review was required under this part. As a result of this review and evaluation, you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge as described in § 112.1(b) from the facility. You must implement any amendment as soon as possible, but not later than six months following preparation of any amendment. You must document your completion of the review and evaluation, and must sign a statement as to whether you will amend the Plan, either at the beginning or end of the Plan or in a log or an appendix to the Plan.

This document represents a revised reorganized plan. The original Plan was prepared in May 2000. In accordance with 40 CFR 112.5(b), a review and evaluation of this Plan will be conducted at least once every five (5) years. However, if a material change is made (as defined in Section 112.5(a)) to the facility operations or procedures that change this Plan, it will be amended as noted below.

As a result of this review and evaluation, the facility will amend the Plan, within six (6) months of the review to include more effective prevention and control technology if:

- (1) such technology will significantly reduce the likelihood of a spill event from the facility, and
- (2) If such technology has been field-proven at the time of the review.

Any technical amendment to the Plan will be certified by a PE within six (6) months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shores. A PE need not certify administrative and managerial modifications to this Plan.

Upon review and evaluation of this Plan, management will complete the following review certification.

REVIEW 1: **Review Date** _____
 Reviewer Name (please print) _____
 Signature _____
 Facility Operator Signature _____
By signature, I have completed review and evaluation of the SPCC
Plan for TOVCC Facility on _____ and will (will not) amend
the Plan as a result.

REVIEW 2: **Review Date** _____
 Reviewer Name (please print) _____
 Signature _____
 Facility Operator Signature _____
By signature, I have completed review and evaluation of the SPCC
Plan for TOVCC Facility on _____ and will (will not) amend
the Plan as a result.

REVIEW 3: **Review Date** _____
 Reviewer Name (please print) _____
 Signature _____
 Facility Operator Signature _____
By signature, I have completed review and evaluation of the SPCC
Plan for TOVCC Facility on _____ and will (will not) amend
the Plan as a result.

REVIEW 4: **Review Date** _____
 Reviewer Name (please print) _____
 Signature _____
 Facility Operator Signature _____
By signature, I have completed review and evaluation of the SPCC
Plan for TOVCC Facility on _____ and
will (will not) amend the Plan as a result.

REVIEW 5: **Review Date** _____
 Reviewer Name (please print) _____
 Signature _____
 Facility Operator Signature _____
By signature, I have completed review and evaluation of the SPCC
Plan for TOVCC Facility on _____ and will (will not) amend
the Plan as a result.

In the event that the facility undergoes a modification that alters the contents of this Plan, including, but not limited to, construction activities, change in ownership, re-fabrication or alteration of the process, an amended Plan will be prepared and certified by a PE familiar with the facility. The amended Plan will replace this Plan. The reason, date and impacted pages of the Plan amendment are to be included on Table 1 below.

[illegible]

5.0 112.7(a) – GENERAL SPCC REQUIREMENTS AND FACILITY CONFORMANCE

MANAGEMENT APPROVAL:

The SPCC Plan is a carefully thought-out plan, prepared in accordance with good engineering practices and the requirements provided in 40 CFR Parts 112.7 and 112.8. This Plan will be implemented as described herein with the full concurrence and commitment from the facility. All levels of management and operating personnel are required to support the intent and procedures as set forth in this document.

This approval extends to the commitment of manpower, resources, equipment, and materials required to expeditiously control and remove any harmful quantity of petroleum-based substances which may be spilled at the facility and/or which may be discharged to nearby navigable waterways.

TOVCC Signature

David J. Blake

Name (please print)

David J. Blake

Title

Mine Manager and Superintendent

Date

June 2, 2011

5.1 Facility Information

5.1.1 Facility Name and Location

The Ohio Valley Coal Company
Powhatan Mine No. 6
56854 Pleasant Ridge Road
Alledonia, OH 43902
(740) 926-1351

USGS Latitude: 39°54'38.73"N

USGS Longitude: 80°59'9.65"W

5.1.2 Facility Owner and Operator

The facility is owned and operated by:

Owner

Murray Energy Corporation
29325 Chagrin Blvd
Suite 300
Pepper Pike, Ohio 44122

Operator

The Ohio Valley Coal Company
Alledonia, OH 43902
(740) 926-1351



5.1.3 Responsible Facility Contacts

The following Table 2 provides information on Responsible Facility Contacts for TOVCC Facility:

Table 2
Responsible Facility Contacts

Name/Title	Location	Telephone
David Blake Mine Manager & Superintendent The Ohio Valley Coal Company	60666 North Anderson Run Road Jacobsburg, OH 43933	(740) 926-1351 x435 (w) (740) 391-4933 (c)
Joe Fraley Project Manager The Ohio Valley Coal Company	56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 (w) (724) 255-4666 (c)
Dave Washinsky Manager of Compliance Murray Energy Corporation	56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 Ext 233 (w) (740)-310-9418 (c) (740) 738-0300 (h)
Farley Wood Director of Environmental Compliance Murray Energy Corporation	56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 Ext 270 (w) (740) 310-0308 (c) (740) 968-1024 (h)

5.1.4 Type of Facility

Bituminous Coal Underground Mining

North American Industry Classification System (NAICS) = 212112 (Bituminous Coal Underground Mining) and Standard Industrial Code (SIC) = 1222 (Bituminous Coal Underground Mining).

Current Facility Operations

The Powhatan Mine No. 6 is an active underground coal mining operation. Raw coal is moved via conveyors from the underground mine to the Alledonia processing plant at Portal No.1. The processing plant separates the rock refuse from the clean coal. Heavy machinery relocates the rock refuse to maintain the dam at the slurry impoundment pond. The clean coal continues on conveyors to the clean coal pile where it is loaded onto delivery trucks and/or rail car. The majority of bulk petroleum storage containers are located at the Alledonia processing plant at Portal No. 1.

Additional air shafts (Shafts A through R) and portals are located within a 20 mile radius of the Alledonia processing plant at Portal No. 1. Portal No. 2 is utilized as a ventilation shaft and provides a subsurface entry point for mine workers. Portal No. 2 and several shafts maintain oil filled transformers and/or emergency diesel generators to power



elevators, escape capsules and/or to provide power in the event of an electrical outage. Specific AST and other bulk storage inventories at TOVCC are provided in **Table 3 – Oil Product Storage in Section 5.4.1 of this SPCC Plan.**

Physical Setting

The Ohio Valley Coal Company – Portal No. 1 Processing Plant is located at 56854 Pleasant Ridge Road, Alledonia, Ohio (Drawing 1). The coal processing area consists of a processing plant, hoist house, equipment maintenance shops, storage buildings and a facility office. The office is surrounded by paved and gravel parking areas and the processing area is surrounded by gravel driveways and parking areas. In order to provide access and ventilation to the subsurface mine, the operation utilizes several access portals and ventilation shafts to service the mine. The portals and shafts are located within a 20 mile radius of the processing plant in Alledonia.

The Ohio Valley Coal Company – Portal No. 2 is located at 60666 Anderson Run Road Jacobsburg, Ohio (Drawing 1). The area consists of a ventilation shaft, access portal to the underground mine, storage buildings and a facility office. The structures are surrounded by paved and gravel parking areas. Portal No. 2 currently serves as one of the main underground mine access points.

Physical facility and operational procedures described herein are intended to satisfy the USEPA Federal regulation 40 CFR Parts 112.7 and 112.8. A topographic map (Drawing 2, modified 7.5 minute USGS Map of the Armstrong Mills Quadrangle), a Site and Drainage Map of the Alledonia Processing Plant at Portal No. 1 (Drawing 3) and a Site and Drainage Map of Portal No. 2 and the Shafts (Drawing 4) are provided in the Drawings tab of this Plan.

Facility Drainage

Portal No. 1 Processing Plant

The facility utilizes a series of retention ponds and drainage swales to direct surface runoff away from the processing areas. The retention ponds and/or drainage swales discharge to one (1) of five (5) National Pollutant Discharge Elimination System (NPDES) Outfalls (001, 002, 007, 011 and 013). In areas where petroleum products are stored and/or handled, drainage ultimately ends up at Pond 10 (Drawing 3). Stormwater is pumped from Pond 10 to the slurry impoundment which discharges to NPDES Outfall 001. According to the Armstrong Mills USGS 7.5 Minute Quadrangle, NPDES Outfall discharges to an unnamed tributary of Captina Creek.

Portal No. 2

Facility drainage at Portal No. 2 is accomplished through the use of stormwater drainage ditches and swales. Stormwater from parking areas and driveways is directed to the ditches/swales and discharged to the adjacent Anderson Run (Drawing 4). There are no other stormwater drainage structures in use at Portal No. 2.

Historical Facility Operations

North American Coal Company began construction of the Powhatan No.6 Mine in 1971. Robert E. Murray purchased the Powhatan No.6 Mine in 1988, the mine's official name was changed to The Ohio Valley Coal Company Powhatan No.6 Mine.

5.2 112.7(a)(1) – Facility Conformance

40 CFR 112.7(a)(1) requires facilities to include a discussion of your facility's conformance with the requirements listed in this part.

Federal regulation 40 CFR Part 112 requires facilities that store, transfer, or consume oil to prepare a SPCC Plan (Plan) if a spill at the facility can impact navigable waters of the United States or adjoining shorelines and if the total aboveground oil storage capacity exceeds 1,320 gallons. Since The Ohio Valley Coal Company meets these criteria, this Plan has been completed and will remain at the site for review by the USEPA and facility employees.

This Plan is designed to reduce the hazards associated with the storage and distribution of oil and to reduce the risk of spreading from unplanned sudden or non-sudden releases of oil to surface water. The Plan is designed primarily to be preventive rather than reactive in nature. **This Plan will be studied carefully by personnel who may become involved in oil spill prevention activities and oil spill related emergencies at the facility and will be readily available to persons qualified to act as an Emergency Response Coordinator.**

In the event of a discharge of oil or oil product in "harmful quantities" into or upon navigable waters or adjoining shorelines from the facility site, this Plan will immediately be implemented. For purposes of this Plan, oil includes petroleum-based fluids or semisolids. "Harmful quantities" is defined as a discharge of oil that violates applicable water quality standards or that causes a film, sheen or discoloration of the surface of the water or emulsions and deposits under the surface. Included herein is a list of names, addresses, and telephone numbers of personnel qualified to act as Emergency Response Coordinators (ERC). This list will be updated as necessary and will be kept current. Changes in the operations, processes, or facilities described in the Plan will be noted in the appropriate reference sections of the Plan within six months of the change. If operational or structural changes are made at the facility that affect the storage or distribution of oil, or if changes are made to the specific spill prevention measures described within this Plan, then a review of the impact of these changes will be made



and noted in the Plan. A review of this Plan will be completed at least once every five years. Changes to the Plan, other than administrative changes, will be reviewed and certified by a registered professional engineer.

The facility does not meet the Criteria for Substantial Harm, and the Certification of the Applicability of Substantial Harm Criteria is provided in **Appendix A** of this Plan. The Certification has been signed and approved by the appropriate TOVCC management personnel.

An Implementation Schedule for maintenance related, programmatic, and/or administrative actions to be employed to reduce the potential for releases or spills to navigable waters located adjacent to the facility is provided in **Appendix B**.

40 CFR Part 112 requires that a complete copy of the SPCC Plan be maintained at the facility if the facility is normally attended at least eight hours per day, or at the nearest field office if the facility is not attended. The facility is operational 24 hours a day 7 days a week. A copy of this Plan is made available during normal business hours and may be reviewed in TOVCC's facility office.

5.3 112.7(a)(2) – Compliance with Applicable Parts

40 CFR 112.7(a)(2) requires facilities to comply with all applicable requirements listed in this part.

Section 5.0 of this Plan and the remainder of this document detail the facility's compliance with applicable requirements of this part.

5.4 112.7(a)(3) – Facility Layout

Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each container. The facility diagram must include completely buried tanks that are otherwise exempted from the requirements of this part under 112.7(d)(4). The facility diagram must also include all transfer stations and connecting pipes.

The Powhatan Mine No. 6 is an active underground coal mining operation. Raw coal is moved via conveyors from the underground mine to the Alledonia processing plant at Portal No.1. The processing plant separates the rock refuse from the clean coal. Heavy machinery relocates the rock refuse to maintain the dam at the slurry impoundment pond. The clean coal continues on conveyors to the clean coal pile where it is loaded onto delivery trucks and/or rail car. The majority of bulk petroleum storage containers are located at the Alledonia processing plant at Portal No. 1.

Additional air shafts (Shafts A through R) and portals are located within a 20 mile radius of the Alledonia processing plant at Portal No. 1. Portal No. 2 is utilized as a ventilation shaft and provides a subsurface entry point for mine workers. Portal No. 2 and several

shafts maintain oil filled transformers and/or emergency diesel generators to power ventilation fans and/or to provide power in the event of an electrical outage. Specific AST and other bulk storage inventories at TOVCC are provided in **Table 3 – Oil Product Storage Section 5.4.1 of this SPCC Plan**.

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The Ohio Valley Coal Company – Portal No. 1 Processing Plant is located at 56854 Pleasant Ridge Road, Alledonia, Ohio (Drawing 1). The coal processing area consists of a processing plant, hoist house, equipment maintenance shops, storage buildings and a facility office. The office is surrounded by paved and gravel parking areas and the processing area is surrounded by gravel driveways and parking areas. In order to provide access and ventilation to the subsurface mine, the operation utilizes several access portals and ventilation shafts to service the mine. The portals and shafts are located within a 20 mile radius of the processing plant in Alledonia.

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Portal No. 2

Facility drainage at Portal No. 2 is accomplished through the use of stormwater drainage ditches and swales. Stormwater from parking areas and driveways is directed to the ditches/swales and discharged to the adjacent Anderson Run (Drawing 4). There are no other stormwater drainage structures in use at Portal No. 2.

5.4.1 112.7(a)(3)(i) – Oil Storage

This Plan must address the type of oil in each container and its storage capacity.

Table 3 provides information about the location, type of oil, and storage container at the facility. The storage areas are noted on ***Drawings 3 and 4 in the Drawings Tab of this SPCC Plan.***

Based on the maximum standard operating volume of oil contained in the tank inventory in Table 3, the total aggregate oil storage capacity at the facility is 79,171 gallons. A copy of the Material Safety Data Sheets (MSDS) for the hazardous and regulated stored substances listed in Table 3 is located in the on-site office and maintenance buildings.

MAXIMUM TOTAL OIL STORAGE: 79,171 gallons

Total storage was calculated using the maximum storage capacity of the tanks, transformers and estimated number of drums; however, the actual operating level is less than this quantity. Drum storage can vary from day to day and depends on facility maintenance activities

Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
Aboveground Storage Tanks								
Fuchs 10W Oil AST	6	3,000	N/A – Monthly Visual Inspections	Double-Wall Steel	10W Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Raw Coal Pile
Fuchs 30W Oil AST	7	3,000	N/A – Monthly Visual Inspections	Double-Wall Steel	30W Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Raw Coal Pile
Kerosene AST	8	1,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Kerosene	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Plant Septic Tank Area
Diesel AST	9	560	N/A – Monthly Visual Inspections	Double-Wall Steel	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Plant Septic Tank Area
Gasoline AST	10	500	N/A – Monthly Visual Inspections	Double-Wall Steel	Gasoline	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Plant Septic Tank Area
Diesel AST	11	520	N/A – Monthly Visual Inspections	Double-Wall Steel	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Supply Yard
Diesel AST	20	1,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Clean Coal Pile

TOVCC 21081

Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
10W Oil AST	21	550	N/A – Monthly Visual Inspections	Double-Wall Steel	10W Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Clean Coal Pile
30W Oil AST	22	550	N/A – Monthly Visual Inspections	Double-Wall Steel	30W Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Clean Coal Pile
Diesel AST	23	5,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Stone Refuse Loading Bin
Fuchs 10W Oil AST	24	2,000	N/A – Monthly Visual Inspections	Single-Wall Steel	10W Oil	Visual/Manual Gauge	Steel Containment Basin	Stone Refuse Loading Bin
Fuchs 30W Oil AST	25	550	N/A – Monthly Visual Inspections	Single-Wall Steel	30W Oil	Visual/Manual Gauge	Steel Containment Basin	Stone Refuse Loading Bin
Used Oil AST	26	1,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Used Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Diesel Shop
Used Anti-Freeze AST	27	500	N/A – Monthly Visual Inspections	Double-Wall Steel	Used Antifreeze	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Diesel Shop

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Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
Diesel AST	31	6,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Prep Plant
Diesel AST	32	500	N/A – Monthly Visual Inspections	Single-Wall	Diesel	Visual/ Manual Gauge	Steel Containment Basin	At Diesel Pump at #2 Dam
Diesel AST	33	150	N/A – Monthly Visual Inspections	Double-Wall	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Portal #2
Solcenic Mixing Tank	34	3,200	N/A – Monthly Visual Inspections	Single-Wall	Solcenic & Water	Visual/ Manual Gauge	Inside Building	Portal #2
Solcenic Mixing Tank	35	3,200	N/A – Monthly Visual Inspections	Single-Wall	Solcenic & Water	Visual/ Manual Gauge	Inside Building	Portal #2
Solcenic Raw Tank	36	8,000	N/A – Monthly Visual Inspections	Single-Wall	Solcenic	Visual/ Manual Gauge	Inside Building	Portal #2
Underground Storage Tanks								
Gasoline UST	1	2,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Gasoline	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Office Entrance

TOVCC 21083

Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
10W Oil UST	2	3,000	N/A – Monthly Visual Inspections	Double-Wall Steel	10W Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Diesel Shop
30W Oil UST	3	3,000	N/A – Monthly Visual Inspections	Double-Wall Steel	30W Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Diesel Shop
Motor Oil UST	4	3,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Motor Oil	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Diesel Shop
Diesel UST	5	8,000	N/A – Monthly Visual Inspections	Double-Wall Steel	Diesel	Interstitial Monitor; Liquid Level Tank Gauge	Double Wall Exterior Steel Tank	Raw Coal Pile
Drums								
Drums 40-50 x 55-gal		2,750	N/A – Monthly Visual Inspections	Metal and Plastic	Lubricating Oils, Motor Oils, Antifreeze	Visual/Manual Gauge	Spill Pallets	Throughout Facility
Oil-Filled Operational Equipment								
Safety Kleen Model 81 Parts Washer		77	N/A – Monthly Visual Inspections	Metal	Petroleum Distillates	Visual/Manual Gauge	Inside Building and Active Measures With Spill Materials	Inside Diesel Shop

TOVCC 21084

Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
Safety Kleen Model 81 Parts Washer		77	N/A – Monthly Visual Inspections	Metal	Petroleum Distillates	Visual/Manual Gauge	Inside Building and Active Measures With Spill Materials	Inside Shop next to Office
Train Load Out Hydraulic Power Pack		30	N/A – Monthly Visual Inspections	Single-Wall Steel	Hydraulic Oil	Visual/Manual Gauge	Inside Building and Active Measures With Spill Materials	Train Load Out Building
Hoist House Hydraulic Power Pack		150	N/A – Monthly Visual Inspections	Single-Wall Steel	Hydraulic Oil	Visual/Manual Gauge	Inside Building and Active Measures With Spill Materials	Hoist House Building
Scalping Tower Hydraulic Power Pack		30	N/A – Monthly Visual Inspections	Single-Wall Steel	Hydraulic Oil	Visual/Manual Gauge	Inside Building and Active Measures With Spill Materials	Scalping Tower Building
Fourth Floor Prep Plant Hydraulic Power Pack		(2) x 55	N/A – Monthly Visual Inspections	Single-Wall Steel	Hydraulic Oil	Visual/Manual Gauge	Inside Building and Active Measures With Spill Materials	Fourth Floor of Prep Plant
Oil Filled Electrical Equipment - Transformers								
Hoist & Belt Transformer	TC 1	535	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Hoist & Belt Transformer	TC 2	517	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Hoist & Belt Transformer	TC 3	496	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Hoist & Belt Transformer	TC 4	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation

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Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
Hoist & Belt Transformer	TC 5	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Hoist & Belt Transformer	TC 6	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Hoist & Belt Transformer	TC 7	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Hoist & Belt Transformer	TC 8	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Hoist & Belt Substation
Main Transformer	TC 11	1270	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 12	1319	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 13	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 14	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 15	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 16	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 17	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 18	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Main Transformer	TC 19	60	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Saffell Ridge Transformer	TC 20	372	N/A	OCB	Transformer Oil	N/A	Active Measures With Spill Materials	Saffell Ridge
Prep Plant Transformer	TC 25	200	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Prep Plant

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Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
Prep Plant Transformer	TC 26	200	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Prep Plant
Prep Plant Transformer	TC 27	200	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Prep Plant
Prep Plant Transformer	TC 28	200	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Prep Plant
Prep Plant Transformer	TC 29	200	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Prep Plant
Thermal Dryer Transformer	TC 30	455	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Thermal Dryer
Anderson Run Transformer	TC 31	951	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Anderson Run
Broast (At Route 9 Substation) Transformer	TC 33	840	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Broast (At Route 9 Substation)
Portal No. 2 Transformer	TC 35	1600	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Portal No. 2
Main Transformer	TC 40	1270	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Main Substation
Cool Hill - Shaft N Transformer	TC 41	2679	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	Cool Hill - Shaft N
#2 Dam Fire Pump Transformer	TC 46	150	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	#2 Dam Fire Pump
#2 Dam Freshwater Transformer	TC 47	643	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	#2 Dam Freshwater

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Table 3
Oil Product Storage at The Ohio Valley Coal Company's Powhatan Mine No. 6

OIL STORAGE DESCRIPTION	TANK ID	OPERATING VOLUME/ MAXIMUM CAPACITY (GALLONS)	TANK INTEGRITY TEST DATE	TYPE	CONTENTS	LEAK DETECTION SYSTEM/ ALARM	CONTAINMENT	LOCATION
7 West - Shaft P Transformer	TC 49	3950	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	7 West - Shaft P
12 West - Shaft R Transformer	TC 50	2875	N/A	Transformer	Transformer Oil	N/A	Active Measures With Spill Materials	12 West - Shaft R
Mobile Tanks								
Mobile Refueler		2000	N/A – Monthly Visual Inspections	Single Wall Steel	Diesel	Visual/Manual Gauge	Active Measures With Spill Materials	Stone Refuse Bin Loading Area
		25		Single Wall Steel	Grease			
		220		Single Wall Steel	Motor Oil			
		250		Single Wall Steel	Motor Oil			
		60		Single Wall Steel	Motor Oil			
		(5) x 120		Single Wall Steel	Motor Oil			

5.4.2 112.7(a)(3)(ii) – Discharge Prevention Measures

This Plan must address discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.).

The prevention of oil spillage and its subsequent discharge into navigable waters is inherent in the design of the facility and operating procedures which is discussed in detail later in this Plan. The facility features storage designs which include provisions to prevent unauthorized access to, and thereby insure accountability for, AST storage reconciliations, both to prevent overfilling and serve as leak detection capability. An adequate amount of contingency planning has been made for this facility to provide for personnel responsibilities and contact information, spill response resources, spill-reporting telephone numbers and access to dedicated spill-response equipment. In accordance with the Implementation Schedule provided in **Appendix B**, the facility will implement annual and new employee training on oil handling and response procedures. The facility has also implemented standard operating procedures specific to TOVCC personnel fueling heavy machinery and/or facility vehicles. The Standard Operating Procedures are provided in **Appendix C**.

The following steps are taken when loading and unloading transport compartments to and from the smaller storage tanks or heavy machinery utilized for mining operations:

1. Trained Personnel are present during the entire unloading and loading operation. In accordance with the implementation schedule provided in **Appendix B**, the facility will implement protocols which require trained security personnel, when available, to be present during the entire loading/unloading operation; or the facility will implement procedures which require the drivers from the fuel-delivery contractor to be properly trained by TOVCC personnel on the facilities fuel-handling procedures.
2. Delivery and pick-up tanker trucks/heavy machinery are inspected and not allowed to unload or load if there are active leaks, evidence of a slow leak, or conditions which might otherwise contribute to a spill.
3. The delivery tanker truck/heavy machinery is properly positioned as close as possible to the AST, the parking brakes set, the transmission in gear, wheel chocks put in place, and engine, lights, and unnecessary electrical equipment turned off.
4. The AST and tank truck/heavy machinery are checked to verify available capacity for the volume to be transferred.
5. Valves are checked to assure that the product to be unloaded or loaded will be transferred into the proper AST or tank truck/heavy machinery compartment. Unloading and loading hose connections are checked for tightness.
6. Lines, hoses, and connections are observed for leaks during unloading or loading operations.
7. The transfer of product **MUST BE** supervised at all times.
8. **DO NOT** leave the controls and go to your cab to do paperwork, while the transfer of product is in progress.
9. **DO NOT** smoke during the transfer of product.

10. If you must leave the controls for any reason, stop the product transfer by shutting down the pump and turning the truck off before leaving.
11. After product transfer is complete, drain all hoses; disconnect nozzles and hoses, being careful of leakage.
12. Sorbent pads or drip pans are placed under the hose connections at the tanker truck/heavy machinery in the case of small quantity spills and/or leaks.
13. Drain mats are placed over storm drains (where applicable) and absorbent materials are readily available in nearby spill kits.
14. After unloading and/or loading is completed, all hoses are checked to assure proper disconnection.
15. Upon completion, the pump is stopped and the compartment valve closed.
16. Clean up any leaks or residual spills around the loading/unloading area and insure you have left no rags or absorbent in the areas. Oil rags and absorbent materials should be placed in proper containers located at the facility.
17. In the event a spill occurs, regardless of the quantity, once the spill is contained you must immediately report the spill to your supervisor.

New shipments of 55-gallon drums are transferred via forklift to one (1) of three (3) storage sheds located on the property. The 55-gallon drums will be staged on spill containment pallets and undercover beneath one of the protective sheds in accordance with the Implementation Schedule provided in **Appendix B**.

5.4.3 112.7(a)(3)(iii) – Discharge Drainage Controls

This Plan must address discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge.

Federal regulation 40 CFR Part 112 requires appropriate containment and/or diversionary structures or equipment to prevent discharged oil from reaching navigable waters. These structures may include dikes, berms, retaining walls, curbing, culverts, gutters, weirs, booms, spill diversion ponds or impounding basins, sumps and sorbents. Spillage resulting from equipment failure such as broken valves, hose failure, etc. will be contained within secondary containment areas, diverted to secondary containment areas or cleaned up and/or contained using facility standard operating procedures (SOPs). Although operating procedures include precautionary measures to prevent or anticipate spills, overfills and unexpected discharges due to equipment failure and smaller "house-keeping" spills, this Plan also addresses contingent and emergency situations which relate to spill reporting, emergency containment, spill stoppage, safety assurance and remedial action.

Raw Coal Pile Storage Area

The double-walled, 3,000-gallon 10W motor oil AST and the double-walled, 3,000-gallon 30W motor oil AST sit on steel legs above a poured concrete pad adjacent to the raw coal pile. The double-wall secondary containment systems are sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled

product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and a direct read liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to these motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Motor oil is dispensed from these tanks to heavy machinery operating at the processing plant via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing area via the retention ponds as described above.

Three (3) 3,000-gallon ASTs are located adjacent to the Raw Coal Pile, however these ASTs are currently out-of-service. In accordance with the Implementation Schedule provided in **Appendix B** the facility will identify, properly clean, and label out-of-service ASTs at the facility. The out-of-service AST locations are provided on **Drawing 3 – Oil Product Storage in the Drawings Tab**.

Plant Septic Tank Area

The double-walled, 1,000-gallon kerosene AST, the double-walled, 520-gallon diesel AST and the double-walled, 500-gallon gasoline AST sit on steel legs above a poured concrete pad adjacent to the plant septic tank area. This double-walled secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and each double-walled AST is equipped with a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to these tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Kerosene, diesel and gasoline are dispensed to facility vehicles at the processing plant via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided at the unloading and fueling areas via the retention ponds as described above.

Supply Yard

The double-walled, 500-gallon diesel AST sits on steel legs above a gravel parking lot in the facilities supply yard. This double-walled secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally a spill kit is located adjacent to the AST.

The tank is equipped with a direct-read visual gauge for overfill protection. The facility receives diesel fuel shipments to this tank from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into the storage tank. Diesel is dispensed to facility vehicles in the supply yard via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading area via the retention ponds as described above.

Clean Coal Pile

The double-walled, 1,000-gallon diesel AST, the double-walled, 550 10W motor oil AST, and the double-walled, 550-gallon 30W motor oil AST sit on steel legs above a poured concrete pad adjacent to the clean coal pile. The double-wall secondary containment systems are sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of each AST. The facility receives product shipments to the diesel and motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Diesel and motor oil is dispensed to heavy machinery operating at the clean coal pile via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the loading area via the retention ponds as described above.

Stone Refuse Loading Bin

The double-walled, 5,000-gallon diesel AST, the single-walled, 2,000-gallon 10W motor oil AST, and the single-walled 550-gallon 30W motor oil AST sit on steel legs within an earthen berm adjacent to the stone refuse loading bin. Secondary containment is provided to the single-wall 2,000-gallon 10W motor oil AST and the single-wall 550-gallon 30W motor oil AST in the form of steel containment basins. These secondary containment systems are sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and the 5,000-gallon double-wall diesel AST is equipped with a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to the diesel and motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Diesel and motor oil is dispensed to heavy machinery operating at the stone refuse loading bin via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing areas via the retention ponds as described above.

Several ASTs and a mobile lube/refueling truck are located in the area adjacent to the stone refuse loading bin. The ASTs and mobile lube/refueling truck are currently out-of-service. In accordance with the implementation schedule provided in **Appendix B** the facility will identify, properly clean, and label out-of-service ASTs and the mobile lube/refueling truck at the facility. The out-of-service ASTs and mobile lube/ refueling truck locations are provided on **Drawing 3 – Oil Product Storage in the Drawings Tab.**

Diesel Shop

The double-walled, 1,000-gallon used oil AST and the double-walled, 500-gallon used antifreeze AST sit on steel legs above a gravel area. The double-wall secondary containment systems are sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and liquid level sensors to monitor the interstitial space between the inner and outer tank walls of each AST. The facility receives product shipments to the motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into the storage tank. The used oil and used antifreeze ASTs are pumped out by TOVCC's waste hauler, Safety Kleen for offsite disposal. The used oil and used antifreeze ASTs are filled via piping that has been installed through the wall of the Diesel Shop. Loading and unloading operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the loading area via the retention ponds as described above.

Coal Preparation Plant

The double-walled, 6,000-gallon diesel AST sits elevated on a concrete pad. The double-wall secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

This tank is equipped with a direct-read visual gauge for overfill protection and a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to the diesel fuel tank from transport tanker trucks. Upon delivery, diesel fuel is transferred via quick-connect flexible hose into the storage tank. Diesel fuel is automatically dispensed to motorized pumps within the processing plant. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing areas via the retention ponds as described above.

#2 Impoundment Dam

The single-walled, 500-gallon diesel AST sits elevated on gravel surface. The AST is staged inside of a steel containment dike that is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished.

This tank is equipped with a direct-read visual gauge for overfill protection. The facility receives product shipments to the diesel fuel tank from transport tanker trucks. Upon delivery, diesel fuel is transferred via quick-connect flexible hose into the storage tank. Diesel fuel is automatically dispensed to the pumps which discharges clean water to NPDES outfall No. 2. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are

scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing areas via the retention ponds as described above.

55-Gallon Drum Storage

Approximately fifty (50) 55-gallon steel drums (various fuel-oils, motor oils, used oils, lubricating oils, hydraulic oil, transmission fluid, antifreeze, windshield washer fluid and grease) are located in storage sheds and/or within the maintenance shops at the facility. The drums are staged on the concrete floor within the maintenance building or on spill pallets undercover in one (1) of three (3) oil storage sheds. The sheds are 3-sided and the pallets sit on gravel. Secondary containment for the drums in the Diesel Shop provided by the building and sealed doorways. There are four (4) floor drains located inside the diesel shop. Three (3) of the four (4) floor drains have been sealed shut. The fourth drain was converted to a sump and holds approximately 30 gallons of primarily rain water that leaks through the overhead door. An oil boom is placed in the sump to capture any oil that may drain into the sump. Before the sump pump is used to pump the rainwater out of the drain the shop foreman will ensure there is no oil sheen on the water.

Since the 55-gallon drums are stored beneath oil storage sheds or within the maintenance building it is highly unlikely that stormwater would come into contact with the drums or the drum contents.

Mobile Refueler/Lube Truck

The facility utilizes a mobile lube truck (Mobile Refueler #1) to service the heavy machinery in use at the mining operation. The mobile lube truck is equipped with a single-walled, 2,000-gallon diesel AST, a single-walled, 220-gallon motor oil AST, a single-walled, 250-gallon motor oil AST, five (5) single-walled, 120-gallon motor oil ASTs and a single-walled, 60-gallon motor oil AST. Prevention for leaks or spills to discharge to the retention ponds while fueling is accomplished through the use of and spill kits. In accordance with the implementation schedule provided in **Appendix B**, the facility will provide a spill kit on the Refueler/Lube truck.

Oil-Filled Electrical Equipment

The facility maintains thirty-eight (38) transformers at the Alledonia processing plant (Portal No. 1), the ventilation shafts and Portal No. 2 (**Table 3 – Oil Product Storage in Section 5.4.1 of the SPCC**). Additionally, the local power company owns and operates oil filled electrical transformers at several shaft locations. Drawing 5 provides all of the shaft locations and which shafts maintain transformers.

Since berming has not been used around transformers owned and operated by the TOVCC, and diversionary structures are not feasible at the transformer locations, TOVCC has instead opted to implement the Alternative Requirements to General Secondary Containment under 40 CFR 112.7(k) in the form of a strong contingency plan. The plan is

based on routine inspections of the transformers for small leaks that are attended to immediately by placing collection devices and absorbent material to prevent the leak from spreading. Materials covered by the oil are removed as soon as possible and replaced with clean material. In the event of a catastrophic failure of a transformer or breaker, station personnel trained in spill response will be dispatched to the designated transformer with mats to cover the drains so that there will be no discharge to a navigable water. Immediately after taking action to prevent discharge to navigable water, the facility's disposal contractor will be called to clean up the spill. In general, all of the transformers in the substations sit on concrete pads surrounded by gravel. In the event of a release, oil stored in the transformers would infiltrate into the subsurface prior to reaching navigable water.

If a release were to occur at substations located at the Alledonia processing plant at Portal No. 1, oil that did not infiltrate into the subsurface would discharge to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. In accordance with the Implementation Schedule provided in **Appendix B**, TOVCC will install spill kits at each transformer substation. This includes all portals and ventilation shafts to satisfy the general secondary containment requirement in providing active measures to prevent petroleum products from reaching a navigable waterway.

Oil Filled Operational Equipment

The facility maintains two (2) parts washers in the office maintenance shop and the diesel shop. Each parts washer contains 77 gallons of petroleum based solvent utilized to clean oily/greasy mining parts. Five (5) hydraulic power packs are utilized at the facility. The hydraulic oil reservoir associated with the power packs range in capacity from 30 gallons to 150 gallons. The power packs are utilized to transfer coal from the underground mine to the raw coal pile, from the raw coal pile to the processing plant, from the processing plant to the clean coal pile and from the clean coal pile to the train and/or truck load-out area.

Since berming has not been used around this oil filled operational equipment and diversionary structures are not feasible at the equipment locations, TOVCC has instead opted to implement the Alternative Requirements to General Secondary Containment under 40 CFR 112.7(k) in the form of a strong contingency plan. The plan is based on routine inspections of the operational equipment for small leaks that are attended to immediately by placing collection devices and absorbent material to prevent the leak from spreading. Materials covered by the oil are removed as soon as possible and replaced with clean material. In the event of a catastrophic failure of a transformer or breaker, personnel trained in spill response will be dispatched to the designated transformer with mats to cover the drains so that there will be no discharge to a navigable water. Immediately after taking action to prevent discharge to navigable water, the facilities disposal contractor will be called to clean up the spill. In accordance with the Implementation Schedule provided in **Appendix B**, TOVCC will install spill kits adjacent to the oil filled operational equipment.

Additional Storage at Portal No.2

The single-walled, 8,000-gallon solcenic lubricant AST sits on steel legs above a poured concrete floor inside of the self contained emulsion building. In addition, the emulsion building contains two (2) plastic 3,200-gallon ASTs used to mix the solcenic lubricant and water. The concrete construction of the building provides secondary containment to contain a release from the AST. This secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Additionally, a spill kit is located adjacent to the AST.

The tank is equipped with a direct-read visual gauge and electronic monitoring for overfill protection. The facility receives product shipments to the Solcenic Lubricant tank from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into the storage tank. Unloading operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. An earthen berm/sump has been installed adjacent to the loading area. In the event of a release, petroleum would discharge into the sump for on-site containment until clean-up can occur. The secondary containment measures will be sufficiently impervious to handle the contents of the tanker truck delivering Solcenic Lubricant to the AST.

Portal No. 2 maintains a back-up generator that utilizes a double-walled, 150-gallon diesel AST that sits on a poured concrete pad adjacent to the generator. The double-walled secondary containment system is sufficiently impervious to handle the entire contents of the AST. Additionally, the facility will install and/or implement active measures to meet the general secondary containment requirements to contain a potential release from the delivery tanker truck. The secondary containment will be sufficiently impervious to handle the contents of the tanker truck delivering diesel fuel to the AST.

5.4.4 112.7(a)(3)(iv) – Countermeasures for Discharge Discovery

This Plan must address countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor).

Under this Plan, the ERC is responsible for initiating emergency response procedures should a spill, discharge, or an emergency situation occur at TOVCC. As warranted by situation and conditions, the following actions will be undertaken by facility employees and designated TOVCC personnel:

BEGIN IMMEDIATELY:

The following procedures are implemented immediately by the ERC whenever there is an imminent or actual emergency situation:

1. If safe to do so, stop, control, contain, remove, and cleanup as soon as a spill or discharge is observed or reported.



2. Activate internal facility alarms or communication systems. Refer to **Table 4 – Notification List provided in Section 5.4.6 of this SPCC Plan.**
3. As warranted, notify appropriate local authorities of the possible need for evacuation and remain available to help officials as needed.
4. As warranted, notify appropriate state or local agencies if their help is needed. Refer to **Table 4 - Notification List** provided below.
5. Note the time, date, and details of the incident and submit a written report to the Regional Administrator, if required. The report will include the following:
 - Name, address, and telephone number of the owner or operator;
 - Name, address, and telephone number of the facility;
 - Date, time, and type of incident;
 - Name and quantity of material(s) involved;
 - The extent of injuries, if any;
 - An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
6. Estimated quantity and disposition of recovered material that resulted from the incident.
7. Immediately identify the character, exact source, amount, and extent of released materials.
8. Assess possible hazards to human health or the environment considering both direct and indirect effects.
9. If operations are stopped in response to a fire, explosion, or release, the ERC must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
10. Reasonable precautions have been taken to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials at the facility.
11. As appropriate, stop processes and operations, collect and contain released materials, and remove or isolate containers.
12. Ensure wastes are handled in the proper manner.
13. Ensure emergency equipment is cleaned and fit for its intended use before operations are resumed.

14. Notify the Regional Administrator, and appropriate state and local authorities, as identified below, that the facility is in compliance before resuming operations.
15. The ERC will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other waste that results from a release, fire, or explosion at the facility.

Internal Communications: Responsible personnel can be contacted via cell phones or normal telephones. Hand held radios may be brought on site for use by personnel as needed. Hand held radios and cell phones can be transmitted and received throughout the facility.

External Communications: Cell phones and/or telephones are available throughout the facility to summon emergency assistance from the local police, fire departments or emergency response contractors.

The Notification List is updated annually, at a minimum, and within 30 days of any changes to personnel, phone numbers, contractors, etc. that impact the notification responsibilities for this Plan.

HELP TO START CLEAN-UP:

1. In the event of a spill, discharge, fire, or explosion which requires specialized assistance by the USEPA or a Response Team, the previously designated personnel assist the responding agency and act as a liaison between agency and facility personnel. Any personnel designated as a company liaison is trained in spill control and cleanup procedures.
2. Required personnel are called in to assist with the cleanup.
3. If, in the designated personnel's judgment, the situation warrants a rapid escalation of response effort, the supervisor is asked to offer assistance.
4. If warranted, additional equipment, outside personnel, etc. are called in to assist with the cleanup.

EXTERNAL ALERT:

If the release is a reportable incident (***see Appendix D for USEPA and OEPA notification and reporting requirements***) within two (2) hours the onsite ERC or designated representative will notify:

National Response Center..... (800) 424-8802
(24 Hours)

Ohio Environmental Protection Agency (OEPA)



Emergency Response Hotline (800) 282-9378
(24 Hours)

Belmont County Emergency Management Agency (740) 695-5984

Ohio Emergency Management Agency (OEMA) (614) 889-7150
(24 Hours)

NOTE: Make sure notifications are made per **Table 4 – Notification List in Section 5.4.6 of this SPCC**.

Facility operational personnel are adequately trained to swiftly and completely respond to an emergency situation using on-site equipment and/or OSRO (Outside Spill Response Organization) (See **Section 4.0 Training of this SPCC Plan**). Facility operational personnel are familiar with this SPCC plan for this facility. This plan addresses emergency response and contingency planning at the TOVCC. The facility has adequate personnel to respond to a small, medium, and worst case spill. In addition, the following resources are available to provide additional contracted help in the event of a spill or pollution incident:

1. Safety Kleen
Wheeling, WV **(304) 233-6577**
(24 Hours)
2. BBU Environmental Services
Lancaster, OH **(800) 837-8064**
(24 Hours)
3. MPW Industrial Services
Hebron, OH **(800) 827-8790**
(24 Hours)
2. C&K Industrial Services
Burgettstown, PA **(724) 947-9401**
(24 Hours)

INFORMATION TO BE TRANSMITTED TO GOVERNMENT AGENCIES:

1. A general description of the spill incident (**Appendix E – Release Notification Form**).
2. Whether emergency vehicles or vessels are required, or if they will be on standby.
3. Names of agencies already notified.
4. Weather and water conditions.
5. Easy, uncomplicated directions to the facility (if asked provide these directions Take Exit 216 off of I-70 and go south on Route 9 and travel 17.9 miles, Make



Right onto SR-148 and travel 3.3 miles; Turn right onto Pleasant Ridge Road and travel 1.1 miles; plant entrance is on the left.

INFORMATION TO BE TRANSMITTED TO RESPONSE TEAMS:

1. A general description of the spill incident.
2. Any other information requested from/to the government agencies.
3. Equipment required for control and cleanup.
4. Weather and water conditions.
5. Easy, uncomplicated directions to the facility.

SPILL REPORT:

A spill report is prepared whenever a spill incident occurs in accordance with **Section 5.5 Reporting Procedures of this SPCC Plan**.

5.4.5 112.7(a)(3)(v) – Disposal Methods

This Plan must address methods of disposal of recovered materials in accordance with applicable legal requirements.

Immediately after an emergency, the ERC will provide for appropriate recovery, storage and re-use or disposal of spill residues. The ERC will contract with a licensed spill control contractor who will dispose of recovered materials as per applicable legal requirements. The facility has developed standard operating procedures for the handling of oil contaminated a materials/waste at the facility. The standard operating procedures are provided in **Appendix C**.

A determination will be made of whether wastes resulting from a release during an emergency are defined as RCRA hazardous wastes. Representative sampling and analysis may be required to make this determination. The ERC will assure that the wastes are stored, manifested, transported and disposed in compliance with applicable state, federal, and local regulations.

5.4.6 112.7(a)(3)(vi) – Contact List

The Plan must contain a contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in 112.7(b).

Upon discovery or occurrence of a spill or release, the following **Table 4 – Notification**



List details the organizations and companies to be included on the spill response contact list. Additionally, a Telephone Spill Incident Reporting Form is provided as **Appendix E**.

Table 4
Notification List

TITLE	NAME & ADDRESS	TELEPHONE NUMBER
Primary Emergency Response Coordinator (ERC)	David Blake Mine Manager & Superintendent The Ohio Valley Coal Company 60666 North Anderson Run Road Jacobsburg, OH 43933	(740) 926-1351 x435 (w) (740) 391-4933 (c)
Secondary Emergency Response Coordinator (ERC)	Joe Fraley Project Manager The Ohio Valley Coal Company 56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 (w) (724) 255-4666 (c)
Other Facility Response Personnel	Dave Washinsky Manager of Compliance Murray Energy Corporation 56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 Ext 233 (w) (740)-310-9418 (c) (740) 738-0300 (h)
	Farley Wood Director of Environmental Compliance Murray Energy Corporation 56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 Ext 270 (w) (740) 310-0308 (c) (740) 968-1024 (h)
Local Fire Department, EMC, or Response Team	Smith Township Fire Department 46389 Firehouse Road Belmont, OH 43718	911 (740) 686-2150 (non emergency)
Local Police Department	Powhatan Point Police Department 4 Mellott Street Powhatan Point, OH 43942-1227	911 (740)795-5755 (non-emergency)
Ambulance	Emergency Medical Transport 101 Maple Avenue Bethesda, OH 43719-9771	911 (740) 484-1105 (non-emergency)
State Agency for Spill Reporting	Ohio EPA Southeast District Office 2195 Front Street Logan, OH 43138	(800) 282-9378 (24-hours) (800) 686-7330
County Emergency Management Agency	Belmont County Emergency Management Agency 68329 Bannock Road St. Clairsville, OH 43950	(740) 695-5984
Federal Agency for Spill Reporting	National Response Center	(800) 424-8802 (24-hours)
	USEPA Region 5 77 West Jackson Boulevard Chicago, IL 60604-3507	(312) 353-2000 (800) 621-8431

Table 4
Notification List

TITLE	NAME & ADDRESS	TELEPHONE NUMBER
Spill Control Contractor	Safety-Kleen Systems 10 Industrial Park Drive, Wheeling, WV 26003-6565	(304) 233-6567
	BBU Environmental Services 2206 Horns Mill Rd SE Lancaster, OH 43130-7716	(800) 837-8064 (24 hours) (740) 681-9048
	MPW Industrial Services 9711 Lancaster Road SE Hebron, Ohio 43025	800-827-8790
	C&K Industrial Services 201 Smith Township Rd Burgettstown, PA 15021	724-947-9401
State Police Department	St. Clairsville Patrol Post 51400 National Road St. Clairsville, OH 43950	911 (877) 772-8765 (24 hours) (740) 695-0915
County Sheriff	Belmont County Sheriff's Office 68137 Hammond Rd. St. Clairsville, OH 43950	911 (740) 695-7933
Local Hospitals	Ohio Valley Medical Center (OVMC) 2000 Eoff Street Wheeling, WV 26003	(304)-234-0123 (24-hours)
	Wheeling Hospital 1 Medical Park Wheeling, WV 26003	(304) 243-3000 (24-hours)
Security	Roaming Security	740-391-0772

As specifically required by the Federal Oil Pollution Act, the OEPA, and local authorities, the agencies identified above will be notified IMMEDIATELY, but not later than two hours after detection of a spill at the facility.

In the event that the quantity of oil spilled is expected to flow into a navigable waterway affecting property, aquatic resource, wildlife and/or water quality, the following parties may also be given verbal notification:

- Murray Energy Corporation Environmental Affairs and Media Relations; and
- Ohio State Police.



An effort will be made to identify and contact downstream water users, which may include various local water authorities, towns, state and local water supply departments, and public water suppliers.

5.5 112.7(a)(4) – Reporting Procedures

This Plan must provide information and procedures in your Plan to enable a person reporting a discharge as described in 112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the quantity discharged as described in 112.1(b); the source of the discharge; a description of affected media; the cause of the discharge; and damages or injuries caused by the discharge; actions being used to stop, remove and mitigate the effects of the discharge; whether an evacuation may be needed; and the names of individuals and/or organizations who have also been contacted.

The National Response Center, the USEPA Region 5 Administrator, the OEPA, and OEMA will be notified immediately upon the determination that the spill has the potential to reach a navigable water as required by 40 CFR 110.10. Where verbal notification is given, a confirming written report will be submitted. TOVCC will prepare and submit a written report within ten (10) working days after completion of the control, containment, removal and restoration operations.

The written report will meet the requirements of 40 CFR 112 and include the following information:

1. Name, address, and telephone number of the individual filing the report;
2. Name, address, and telephone of the installation;
3. Date, time and place of spill;
4. Amount and type of oil spilled;
5. Maximum storage or handling capacity of the facility;
6. Complete description of circumstances contributing to the spill;
7. Complete description of containment, removal, clean-up, and restoration operations, including disposal sites and costs of operations;
8. Procedures, methods, and precautions instituted to prevent a recurrence of an spill;
9. An adequate description of the facility including maps, flow diagrams, and topographical maps;
10. Other information considered necessary to completely describe the incident; and
11. A certification that the information provided is true and correct to the knowledge of the individual signing the report.

Further, if this facility has one spill event of more than 1,000-gallons of oil or two spill events of more than 42-gallons combined within any twelve month period, a written report addressing the information listed in items 1-11 above will be submitted to the

USEPA Region 5 Administrator within 60 days of the occurrence in accordance with 40 CFR 112.4(a).

These written notifications will be sent to the following addresses or as otherwise directed:

USEPA Region V

77 West Jackson Boulevard
Chicago, IL 60604

OEPA – Southeast District Office

2195 Front Street
Logan, OH 43138

Belmont County Emergency Management Agency

68329 Bannock Road
St. Clairsville, OH 43950

5.6 112.7(a)(5) – Discharge Procedures

Unless you have submitted a response plan under 112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

This Plan has been prepared and organized in accordance with 40 CFR Parts 112.7 and 112.8 to be readily usable in the event of a spill. In the event of a spill, the person discovering the release will follow the procedures outlined in Section 5.4.4, Countermeasures for Discharge Discovery and Section 5.5, Reporting Procedures.

6.0 112.7(b) – SPILL PREDICTIONS

Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.

This facility has spill collection and containment structures that are intended to prevent spillage from reaching navigable waters. Areas that do not have adequate spill containment are described in the section above and will be addressed as described in the Implementation Schedule provided in **Appendix B**. The spill potential described in Table 5 is based on the failure of normal storage, piping, and the simultaneous failure of collection and containment procedures. The following spill predictions include direction and total quantity of petroleum that could be discharged along with a general description of the rate of flow for potential releases. The actual rate of flow for potential spills is dependant on factors such as the release rate from the source, volume of the release, physical properties of the released media, the surface on which the media is released, temperature, etc. Drawings 3 and 4 illustrate the locations of the sources for surface spills and the most probable flow routes from the spill source areas at Alledonia processing plant at Portal No. 1 and Portal No. 2. The following table details the locations, amounts, and fate of a potential spill.

Table 5
Equipment Failure Spill Potential Analysis

SOURCE	TYPE OF FAILURE	VOLUME (GALLONS)	SPILL RATE	DIRECTION OF FLOW	CONTAINMENT/DIVERSIONARY STRUCTURE OR EQUIPMENT
Raw Coal Pile	Overfill/Rupture	(2) 3,000-Gallon Motor Oil ASTs	5 to 50 GPM	Discharge would flow into Pond 2 then Pond 10. Both ponds contain oil absorbent booms. Pond 10 Discharges to the Slurry Impoundment which eventually discharges to Outfall 001	Double Walled ASTs and Spill Kit
Plant Septic Tank Area	Overfill/Rupture	(1) 1,000-Gallon Kerosene (1) 520-Gallon Diesel (1) 500-Gallon Gasoline	5 to 50 GPM	Discharge would flow into Ditch A then Pond 10. Both ponds contain oil absorbent booms. Pond 10 Discharges to the Slurry Impoundment which eventually discharges to Outfall 001	Double-Walled AST or Steel Containment Dike
Supply Yard	Overfill/Rupture	(1) 520-Gallon Diesel	5 to 50 GPM		Steel Containment Dike

Table 5 (continued)
Equipment Failure Spill Potential Analysis

Source	Type of Failure	Volume (Gallons)	Spill Rate	Direction of Flow	Containment/ Diversionary Structure or Equipment
Clean Coal Pile Area	Overfill/ Rupture	(1) 1,000-Gallon Diesel (2) 550-Gallon Motor Oil	5 to 50 GPM	Discharge would flow into the EPA pond then Pond 10. Both ponds contain oil absorbent booms. Pond 10 discharges to the Slurry Impoundment which eventually discharges to Outfall 001	Double-Walled ASTs and Spill Kit
Stone Refuse Loading Bin	Overfill/ Rupture	(1) 5,000-Gallon Diesel (1) 2,000-Gallon Motor Oil (1) 550-Gallon Motor Oil	5 to 50 GPM	Discharge would flow toward Ditch A or Pond 10. Ditch A ultimately discharges to Pond 10. Both structures contain oil absorbent booms. Pond 10 discharges to the Slurry Impoundment which eventually discharges to Outfall 001.	(1) Double-Walled AST and (2) Single-Walled ASTs staged inside of steel containment dikes. All 3 ASTs are also staged inside of an earthen berm. Additionally a Spill Kit is located adjacent to the ASTs
Diesel Shop	Overfill/ Rupture	(1) 1,000-Gallon Used Oil (1) 500-Gallon Used Antifreeze	5 to 50 GPM	Discharge would flow into Pond 2 then Pond 10. Both ponds contain oil absorbent booms. Pond 10 Discharges to the Slurry Impoundment which eventually discharges to Outfall 001	Double-Walled ASTs and Spill Kit
Coal Prep Plant	Overfill/ Rupture	(1) 6,000-Gallon Diesel	5 to 50 GPM	Discharge would flow into Pond 2 then Pond 10. Both ponds contain oil absorbent booms. Pond 10 Discharges to the Slurry Impoundment which eventually discharges to Outfall 001	Double-Walled AST and Spill Kit

Table 5 (continued)
Equipment Failure Spill Potential Analysis

Source	Type of Failure	Volume (Gallons)	Spill Rate	Direction of Flow	Containment/ Diversionary Structure or Equipment
#2 Impoundment Dam	Overfill/ Rupture	500	5 to 50 GPM	Discharge would flow into the Slurry Impoundment which eventually discharges to Outfall 001	Steel Containment Dike and Spill Kit
Portal No. 2	Overfill/ Rupture	(1) 150-Gallon Diesel	5 to 50 GPM	Discharge would into gravel driveways or grassy areas. The release would discharge directly to Anderson Run	In accordance with the Implementation Schedule provided in Appendix B, the facility will provide secondary containment to the diesel AST.
Portal No. 2 – Emulsion Building	Overfill Rupture	(1) 8,000-Gallon Solcenic Lubricant (2) 3,200-Gallon Water/Solcenic Mixing Tanks	5 to 50 GPM	If a release were to breach the concrete secondary containment building, petroleum would discharge directly to Anderson Run.	The AST is located inside of a concrete building that provides adequate storage to contain the entire contents of the 8,000-gallon AST.
(50) 55-Gallon Drums	Overfill/ Rupture	55 Gallons	5 to 10 GPM	Three (3) drum storage sheds are located around the property. If not contained, a discharge would ultimately end up at Pond 10. Pond 10 contains oil absorbent booms and discharges to the slurry impoundment which eventually discharges to Outfall 001.	Staged on spill containment pallets beneath oil storage sheds or stored within the Maintenance Shops

Table 5 (continued)
Equipment Failure Spill Potential Analysis

Source	Type of Failure	Volume (Gallons)	Spill Rate	Direction of Flow	Containment/ Diversionary Structure or Equipment
Tank Loading at Alledonia Processing Plant – Portal No. 1	Overfill/ Rupture	Depends on size of Tanker	50 to 100 gallons per minute	If not contained, a discharge would ultimately end up at Pond 10. Pond 10 contains oil absorbent booms and discharges to the slurry impoundment which eventually discharges to Outfall 001	Oil Booms placed on each drainage ditch an/or retention pond.
Tank Loading/ Unloading at Portal No. 2	Overfill/ Rupture	Depends on size of Tanker	50 to 100 gallons per minute	Discharge would flow into an earthen berm/sump adjacent to the concrete building. The earthen berm/sump is equipped with drainage valves that are closed during loading activities. If a release were to breach the earthen berm, the lubricant would flow toward Anderson Run.	Earthen Containment Berm/Sump that discharges into the emulsion building.
Based on tanker truck pumping rate of 150 gallons per minute. Standard operating procedure is for the truck operator and TOVCC personnel to be present during all unloading activities. Assuming that the operator shuts off the valve within 20 seconds of a release, the maximum, reasonably expected discharge is 50 gallons per minute.					

7.0 112.7(c) – CONTAINMENT/DIVERSIONARY STRUCTURES

Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in 112.1(b). The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.

Raw Coal Pile Storage Area

The double-walled, 3,000-gallon 10W motor oil AST and the double-walled, 3,000-gallon 30W motor oil AST sit on steel legs above a poured concrete pad adjacent to the raw coal pile. The double-wall secondary containment systems are sufficiently impervious to spilled products and allow for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and a direct read liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to these motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Motor oil is dispensed from these tanks to heavy machinery operating at the processing plant via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing area via the retention ponds as described above.

Three (3) 3,000-gallon ASTs are located adjacent to the Raw Coal Pile, however these ASTs are currently out-of-service. In accordance with the Implementation Schedule provided in **Appendix B** the facility will identify, properly clean, and label out-of-service ASTs at the facility. The out-of-service AST locations are provided on **Drawing 3 – Oil Product Storage in the Drawings Tab**.

Plant Septic Tank Area

The double-walled, 1,000-gallon kerosene AST, the double-walled, 520-gallon diesel AST and the double-walled, 500-gallon gasoline AST sit on steel legs above a poured concrete pad adjacent to the plant septic tank area. This double-walled secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed

to prevent petroleum from entering a navigable waterway. Additionally a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and each double-walled AST is equipped with a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to these tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Kerosene, diesel and gasoline are dispensed to facility vehicles at the processing plant via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided at the unloading and fueling areas via the retention ponds as described above.

Supply Yard

The double-walled, 500-gallon diesel AST sits on steel legs above a gravel parking lot in the facilities supply yard. This double-walled secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally a spill kit is located adjacent to the AST.

The tank is equipped with a direct-read visual gauge for overfill protection. The facility receives diesel fuel shipments to this tank from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into the storage tank. Diesel is dispensed to facility vehicles in the supply yard via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading area via the retention ponds as described above.

Clean Coal Pile

The double-walled, 1,000-gallon diesel AST, the double-walled, 550 10W motor oil AST, and the double-walled, 550-gallon 30W motor oil AST sit on steel legs above a poured concrete pad adjacent to the clean coal pile. The double-wall secondary containment systems are sufficiently impervious to spilled products and allow for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of each AST. The facility receives product shipments to the diesel and motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Diesel and motor oil is dispensed to heavy machinery operating at the clean coal pile via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the loading area via the retention ponds as described above.

Stone Refuse Loading Bin

The double-walled, 5,000-gallon diesel AST, the single-walled, 2,000-gallon 10W motor oil AST, and the single-walled 550-gallon 30W motor oil AST sit on steel legs within an earthen berm adjacent to the stone refuse loading bin. Secondary containment is provided to the single-wall 2,000-gallon 10W motor oil AST and the single-wall 550-gallon 30W motor oil AST in the form of steel containment basins. These secondary containment systems are sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and the 5,000-gallon double-wall diesel AST is equipped with a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to the diesel and motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into each storage tank. Diesel and motor oil is dispensed to heavy machinery operating at the stone refuse loading bin via motorized dispensing pumps. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing areas via the retention ponds as described above.

Several ASTs and a mobile lube/refueling truck are located in the area adjacent to the stone refuse loading bin. The ASTs and mobile lube/refueling truck are currently out-of-service. In accordance with the implementation schedule provided in **Appendix B** the facility will identify, properly clean, and label out-of-service ASTs and the mobile lube/refueling truck at the facility. The out-of-service ASTs and mobile lube/ refueling truck locations are provided on **Drawing 3 – Oil Product Storage in the Drawings Tab.**

Diesel Shop

The double-walled, 1,000-gallon used oil AST and the double-walled, 500-gallon used antifreeze AST sit on steel legs above a gravel area. The double-wall secondary containment systems are sufficiently impervious to spilled products and allow for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

Each tank is equipped with a direct-read visual gauge for overfill protection and liquid level sensors to monitor the interstitial space between the inner and outer tank walls of each AST. The facility receives product shipments to the motor oil tanks from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into the storage tank. The used oil and used antifreeze ASTs are pumped out by TOVCC's waste hauler, Safety Kleen for offsite disposal. The used oil and used antifreeze ASTs are filled via piping that has been installed through the wall of the Diesel Shop. Loading and unloading operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the loading area via the retention ponds as described above.

Coal Preparation Plant

The double-walled, 6,000-gallon diesel AST sits elevated on a concrete pad. The double-wall secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Tertiary containment is provided in the form of drainage structures at the facility that would direct a release to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. Additionally, a spill kit is located adjacent to the ASTs.

This tank is equipped with a direct-read visual gauge for overfill protection and a liquid level sensor to monitor the interstitial space between the inner and outer tank walls of the AST. The facility receives product shipments to the diesel fuel tank from transport tanker trucks. Upon delivery, diesel fuel is transferred via quick-connect flexible hose into the storage tank. Diesel fuel is automatically dispensed to motorized pumps within the processing plant. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing areas via the retention ponds as described above.

#2 Impoundment Dam

The single-walled, 500-gallon diesel AST sits elevated on gravel surface. The AST is staged inside of a steel containment dike that is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished.

This tank is equipped with a direct-read visual gauge for overfill protection. The facility receives product shipments to the diesel fuel tank from transport tanker trucks. Upon delivery, diesel fuel is transferred via quick-connect flexible hose into the storage tank. Diesel fuel is automatically dispensed to the pumps which discharges clean water to NPDES outfall No. 2. Unloading and dispensing operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. Secondary containment is provided to the unloading and dispensing areas via the retention ponds as described above.

55-Gallon Drum Storage

Approximately fifty (50) 55-gallon steel drums (various fuel-oils, motor oils, used oils, lubricating oils, hydraulic oil, transmission fluid, antifreeze, windshield washer fluid and grease) are located in storage sheds and/or within the maintenance shops at the facility. The drums are staged on the concrete floor within the maintenance building or on spill pallets undercover in one (1) of three (3) oil storage sheds. The sheds are 3-sided and the pallets sit on gravel. Secondary containment for the drums in the Diesel Shop provided by the building and sealed doorways. There are four (4) floor drains located inside the diesel shop. Three (3) of the four (4) floor drains have been sealed shut. The fourth drain was converted to a sump and holds approximately 30 gallons of primarily rain water that leaks through the overhead door. An oil boom is placed in the sump to capture any oil that may drain into the sump. Before the sump pump is used to pump the rainwater out of the drain the shop foreman will ensure there is no oil sheen on the water.

Since the 55-gallon drums are stored beneath oil storage sheds or within the maintenance building it is highly unlikely that stormwater would come into contact with the drums or the drum contents.

Mobile Refueler/Lube Truck

The facility utilizes a mobile lube truck (Mobile Refueler #1) to service the heavy machinery in use at the mining operation. The mobile lube truck is equipped with a single-walled, 2,000-gallon diesel AST, a single-walled, 220-gallon motor oil AST, a single-walled, 250-gallon motor oil AST, five (5) single-walled, 120-gallon motor oil ASTs and a single-walled, 60-gallon motor oil AST. Prevention for leaks or spills to discharge to the retention ponds while fueling is accomplished through the use of and spill kits. In accordance with the implementation schedule provided in **Appendix B**, the facility will provide a spill kit on the Refueler/Lube truck.

Oil-Filled Electrical Equipment

The facility maintains thirty-eight (38) transformers at the Alledonia processing plant (Portal No. 1), the ventilation shafts and Portal No. 2 (**Table 3 – Oil Product Storage in Section 5.4.1 of the SPCC**). Additionally, the local power company owns and operates oil filled electrical transformers at several shaft locations. Drawing 5 provides all of the shaft locations and which shafts maintain transformers.

Since berming has not been used around transformers owned and operated by the TOVCC, and diversionary structures are not feasible at the transformer locations, TOVCC has instead opted to implement the Alternative Requirements to General Secondary Containment under 40 CFR 112.7(k) in the form of a strong contingency plan. The plan is based on routine inspections of the transformers for small leaks that are attended to immediately by placing collection devices and absorbent material to prevent the leak from spreading. Materials covered by the oil are removed as soon as possible and replaced with clean material. In the event of a catastrophic failure of a transformer or breaker, station personnel trained in spill response will be dispatched to the designated transformer with mats to cover the drains so that there will be no discharge to a navigable water. Immediately after taking action to prevent discharge to navigable water, the facility's disposal contractor will be called to clean up the spill. In general, all of the transformers in the substations sit on concrete pads surrounded by gravel. In the event of a release, oil stored in the transformers would infiltrate into the subsurface prior to reaching navigable water.

If a release were to occur at substations located at the Alledonia processing plant at Portal No. 1, oil that did not infiltrate into the subsurface would discharge to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. In accordance with the Implementation Schedule provided in **Appendix B**, TOVCC will install spill kits at each transformer substation. This includes all portals and ventilation shafts to satisfy the general secondary containment requirement in providing active measures to prevent petroleum products from reaching a navigable waterway.

Oil Filled Operational Equipment

The facility maintains two (2) parts washers in the office maintenance shop and the diesel shop. Each parts washer contains 77 gallons of petroleum based solvent utilized to clean oily/greasy mining parts. Five (5) hydraulic power packs are utilized at the facility. The hydraulic oil reservoir associated with the power packs range in capacity from 30 gallons to 150 gallons. The power packs are utilized to transfer coal from the underground mine to the raw coal pile, from the raw coal pile to the processing plant, from the processing plant to the clean coal pile and from the clean coal pile to the train and/or truck load-out area.

Since berming has not been used around this oil filled operational equipment and diversionary structures are not feasible at the equipment locations, TOVCC has instead

opted to implement the Alternative Requirements to General Secondary Containment under 40 CFR 112.7(k) in the form of a strong contingency plan. The plan is based on routine inspections of the operational equipment for small leaks that are attended to immediately by placing collection devices and absorbent material to prevent the leak from spreading. Materials covered by the oil are removed as soon as possible and replaced with clean material. In the event of a catastrophic failure of a transformer or breaker, personnel trained in spill response will be dispatched to the designated transformer with mats to cover the drains so that there will be no discharge to a navigable water. Immediately after taking action to prevent discharge to navigable water, the facilities disposal contractor will be called to clean up the spill. In accordance with the Implementation Schedule provided in **Appendix B**, TOVCC will install spill kits adjacent to the oil filled operational equipment.

Additional Storage at Portal No.2

The single-walled, 8,000-gallon solcenic lubricant AST sits on steel legs above a poured concrete floor inside of the self contained emulsion building. In addition, the emulsion building contains two (2) plastic 3,200-gallon ASTs used to mix the solcenic lubricant and water. The concrete construction of the building provides secondary containment to contain a release from the AST. This secondary containment system is sufficiently impervious to spilled products and allows for on-site containment until a cleanup of the spilled product can be accomplished. Additionally, a spill kit is located adjacent to the AST.

The tank is equipped with a direct-read visual gauge and electronic monitoring for overfill protection. The facility receives product shipments to the Solcenic Lubricant tank from transport tanker trucks. Upon delivery, petroleum products are transferred via quick-connect flexible hose into the storage tank. Unloading operations at the facility are performed manually, supervised by facility employees or security when available, and are scheduled on an as-needed basis during normal business hours of operation. An earthen berm/sump has been installed adjacent to the loading area. In the event of a release, petroleum would discharge into the sump for on-site containment until clean-up can occur. The secondary containment measures will be sufficiently impervious to handle the contents of the tanker truck delivering Solcenic Lubricant to the AST.

Portal No. 2 maintains a back-up generator that utilizes a double-walled, 150-gallon diesel AST that sits on a poured concrete pad adjacent to the generator. The double-walled secondary containment system is sufficiently impervious to handle the entire contents of the AST. Additionally, the facility will install and/or implement active measures to meet the general secondary containment requirements to contain a potential release from the delivery tanker truck. The secondary containment will be sufficiently impervious to handle the contents of the tanker truck delivering diesel fuel to the AST.

Spill Control Equipment

Table 6 lists the amount of spill control materials maintained at the facility. The equipment is inspected monthly, properly maintained and restocked as needed. Drawings 3 and 4 illustrate where spill control equipment is located at the facilities. The Facility Manager or his designee will be responsible for developing and maintaining an inventory of spill response materials. This equipment is housed in clearly labeled containers located in visible and easily accessible areas.

Table 6
Spill Control Equipment Maintained at the Facility

QUANTITY	LOCATION	DESCRIPTION
SPILL KITS		
A Spill Kit Located At Each of the Areas Identified on Table 3 – Oil Product Storage and at each Substation Containing a Transformer	Adjacent to the Identified on Table 3 – Oil Product Storage at each Substation Containing a Transformer.	3" x 48" Oil Absorbent Socks Oil Absorbent Pads Clean-Up Bags and Ties

8.0 112.7(d) – OIL SPILL CONTINGENCY PLAN

If you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c) to prevent a discharge as described in 112.1(b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under 112.20, provide in your Plan (1) an oil spill contingency plan following the provisions of part 109 of this chapter and (2) a written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Once the facility fully implements the items discussed in the Implementation Schedule (**Appendix B**), the structures and/or practices in place would prevent a discharge from reaching a navigable waterway as described in 112.7(b). Based on the facility's preventive and active measures, it is unlikely that a release at the site (minor or catastrophic) would reach navigable waters. Therefore, an Oil Spill Contingency Plan in accordance with 40 CFR Part 109 has not been prepared for this facility.

9.0 112.7(e) – INSPECTIONS, TESTS AND RECORDS

Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

The following inspection procedures have been developed for the facility. Copies of the inspection forms are maintained on file with the Plan for a minimum of three years. The Monthly Inspection Form is provided in **Appendix F**

The schedule of inspections is described below:

WEEKLY VISUAL INSPECTIONS (NOT DOCUMENTED)

- Walk around visual inspections of facility storage, equipment, structures, etc. are conducted on a weekly basis during tank loading/unloading/dispensing activities. However, inspections are only documented on a monthly basis.

MONTHLY DOCUMENTED INSPECTIONS

- Containerized Storage: Inspect the condition and integrity of the AST, mobile re-fuelers, transformers and drums for damage, cracks and/or leaks.
- Containerized Storage: Review the inventory of petroleum materials stored at the facility.
- Inspect the spill kits and other emergency use equipment.
- Emergency Sub-Systems: Inspect fire extinguishers, fire suppression system components and other panels.
- Stormwater Control Systems: Inspect the stormwater inlets, retention ponds and unpaved discharge swales for impact from petroleum liquids or other substances.

ANNUALLY

- Plan Review and Spill Prevention Briefing: The ERC will conduct an annual review of the plan in conjunction with a Spill Prevention Briefing. The facility will incorporate this training with their annual Mine Safety and Health Administration (MSHA) training.
- The facility conducts sampling and reporting in accordance with the NPDES Permit.

FIVE YEAR UPDATE

- Plan Review and Re-Certification: The federal SPCC regulations require that the ERC perform a 5-year review of the SPCC Plan. If the plan requires technical amendments (based on the review), the plan will require a re-certification with a Registered Professional Engineer. However, if there are no changes and/or only administrative changes, the facility may update the plan without the need for re-certification. In addition, if the facility meets the requirements of a "Qualified Facility" under 40 CFR Part 112, then the facility may self-certify the plan. The review will encompass the inspection records, incident reports, plan updates or deletions. The Registered Professional Engineer shall re-certify the plan after the review and technical amendments are completed.

Inspections and Testing of Storage Containers

- The ASTs are painted to prevent corrosion. The oil-containing equipment is visually inspected weekly and documented monthly by facility personnel. Particular attention is given to weld seams, gaskets, pumps, bolts, hoses, and joints. The immediate areas around the facility are also periodically examined for evidence of oil. A discrepancy found in an area is noted and immediate corrective action taken. Upon completion of the inspection, the inspection document(s) will be signed by the person performing the inspection and a copy of the completed checklist will be attached to this document and/or be kept on file at the facility. Copies of the inspection forms can be found in **Appendix F** of this Plan.
- The double-walled ASTs are equipped with an interstitial sensor system to monitor for oil leaks within the space between the inner and outer tanks. The proper operation of this system is checked, inspected and documented on a monthly basis.

Based on these factors and in accordance with the STI-SP001 guidance for factory manufactured ASTs less than or equal to 5,000, weekly visual observations and monthly inspection documentation is sufficient to comply with this section and 112.7(a)(2) [Section 5.3].

In accordance with the STI-SP001 guidance for factory manufactured ASTs greater than 5,000 gallons, weekly visual observations, monthly inspection documentation and a formal external inspection every 20 years is sufficient to comply with this section and 112.7(a)(2) [Section 5.3].

Underground storage tanks (USTs) at the facility are inspected by a certified inspection contractor every three (3) years. The last UST inspection was completed in November 2010 and the next inspection is scheduled for November 2013.

10.0 112.7(f) – PERSONNEL, TRAINING AND PREVENTION PROCEDURES

10.1 112.7(f)(1) – Training

At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.

TOVCC is committed to training its employees in environmental and emergency issues affecting employee and facility safety. An annual training session is conducted to familiarize new employees with this SPCC plan and serve as a means to disseminate plan updates or revisions to the senior workforce. The ERC or a designated assistant will conduct the training in multiple sessions to ensure that shift employees are able to attend. A copy of the Discharge Prevention Briefing form and training log form are included in **Appendix E**.

The TOVCC employees receive training in the acknowledgment of facility emergency communication systems, response to emergency situations, stormwater management, and the proper handling and disposal of materials used in emergency response. Training is documented through use of the training log, which must be signed by each attendee. Training document(s) are kept on file and a copy of the Plan is available upon request for employees at all times. The ERC is responsible for the selection and further training of those employees who may be designated as first responders. Those selected receive additional instruction beyond the group session.

10.2 112.7(f)(2) – Discharge Prevention Personnel

Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.

The persons identified in Table 7 have been approved by management to act as primary and alternate responsible parties in case of a spill at the facility. In the event of a spill emergency, these people should be contacted in the order listed:

Table 7
Discharge Prevention Personnel

Name/Title	Location	Telephone
David Blake Mine Manager & Superintendent The Ohio Valley Coal Company	60666 North Anderson Run Road Jacobsburg, OH 43933	(740) 926-1351 x435 (w) (740) 391-4933 (c)
Joe Fraley Project Manager The Ohio Valley Coal Company	56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 (w) (724) 255-4666 (c)
Dave Washinsky Manager of Compliance Murray Energy Corporation	56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 Ext 233 (w) (740)-310-9418 (c) (740) 738-0300 (h)
Farley Wood Director of Environmental Compliance Murray Energy Corporation	56854 Pleasant Ridge Road Alledonia, OH 43902	(740) 926-1351 Ext 270 (w) (740) 310-0308 (c) (740) 968-1024 (h)

10.3 112.7(f)(3) – Discharge Prevention Briefings

Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in 112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.

The facility conducts initial job training and annual spill prevention briefings (see **Appendix E** for the Discharge Prevention Briefing Log). Refer to Section 10.1 of this Plan for further details.

11.0 112.7(g) – SECURITY

Describe in your Plan how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

TOVCC is properly protected against vandals and intruders on a 24-hour basis. Visitors to the facility are required to log-in at the front reception area and arrange for an escort within. In accordance with the implementation schedule provided in **Appendix B**, the facility will implement protocols which require trained security personnel, when available, to be present during the entire loading/unloading operation; or the facility will implement procedures which require the drivers from the fuel-delivery contractor to be properly trained by TOVCC personnel on the facilities fuel-handling procedures.

The grounds and facility exterior are illuminated by security lighting, including all the tanks. A chain-link security fence encloses the majority of the property. Those areas not fenced and/or gated are provided with surveillance cameras that are monitored 24/7 and security personnel routinely inspect the mining operation for suspicious activity.

Valves and outlets which permit direct outward flow of the ASTs contents remain in the closed position when in non-operating status. This is ensured by on-site facility personnel during normal hours of operations.

The starter controls on the dispenser pumps are not accessible or activated by anyone except authorized personnel. No automatic electrical oil pumps are used in conjunction with the oil storage at the facility.

Master flow and drain valves of the tanks are securely locked in the closed position when in non-operating and/or non-standby status. In addition, there are check valves on the fill lines that will prevent outward flow of the tank's contents. In accordance with the Implementation Schedule provided in **Appendix B**, the facility will install/repair check valves and or nozzles on dispensing equipment that is lacking or needs repair.

12.0 112.7(h) – LOADING/UNLOADING RACKS

12.1 112.7(h)(1) – Containment Systems

Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

There is no loading or unloading rack operations performed at the facility. Therefore, the facility is only required to meet the general secondary containment requirements set forth in Section 112.7(c) and does not need to comply with the requirements of this section. See Section 5.0 for loading/unloading area containment information.

12.2 112.7(h)(2) – Warning Systems

Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.

Although the facility is not equipped with loading/unloading racks, in accordance with the implementation schedule provided in **Appendix B**, the facility will implement protocols which require trained security personnel, when available, to be present during the entire loading/unloading operation; or the facility will implement procedures which require the drivers from the fuel-delivery contractor to be properly trained by TOVCC personnel on the facilities fuel-handling procedures. Drivers are instructed to use wheel chocks during loading/ unloading operations. Departing drivers are cautioned to disconnect flexible transfer hoses and ground wires before moving the truck.

12.3 112.7(h)(3) – Departure Procedures

Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Although the facility is not equipped with loading/unloading racks, TOVCC has implemented Standard Operating Procedures that require prior to departure of tanker trucks, the lower drain and other outlets are checked for leakage. Problems are corrected before departure.

13.0 112.7(i) – FIELD CONSTRUCTED CONTAINERS

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

There are no field constructed containers on-site; therefore Part 112.7(i) is not applicable to this facility.

14.0 112.7(j) – OTHER APPLICABLE REQUIREMENTS

In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.

According to TOVCC, the facility has prepared and implemented a Stormwater Pollution Prevention Plan (SWPPP). This plan was prepared as part of the application package for a Surface Mining Control and Reclamation Act (SMCRA) permit.

15.0 112.7 (k) – QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT

The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.

Oil-Filled Electrical Equipment

The facility maintains thirty-eight (38) transformers at the Alledonia processing plant (Portal No. 1), the ventilation shafts and Portal No. 2 (**Table 3 – Oil Product Storage in Section 5.4.1 of the SPCC**). Additionally, the local power company owns and operates oil filled electrical transformers at several shaft locations. Drawing 5 provides all of the shaft locations and which shafts maintain transformers.

Oil Filled Operational Equipment

The facility maintains two (2) parts washers in the office maintenance shop and the diesel shop. Each parts washer contains 77 gallons of petroleum based solvent utilized to clean oily/greasy mining parts. Five (5) hydraulic power packs are utilized at the facility. The hydraulic oil reservoir associated with the power packs range in capacity from 30 gallons to 150 gallons. The power packs are utilized to transfer coal from the underground mine to the raw coal pile, from the raw coal pile to the processing plant, from the processing plant to the clean coal pile and from the clean coal pile to the train and/or truck load-out area.

15.1 112.7(k)(1) – Qualification Criteria – Reportable Discharge History

The owner or operator of a facility that has had no single discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war or terrorism).

According to TOVCC there have been no reported discharges from oil-filled operational equipment meeting the requirements of 112.7(k)(1).

15.2 112.7(k)(2) – Alternative Requirements to General Secondary Containment

If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:

- (i) *Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and*
- (ii) *Unless you have submitted a response plan under §112.20, provide in your Plan the following:*
 - (a) *An oil spill contingency plan following the provisions of part 109 of this chapter.*
 - (b) *A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.*

Oil Filled Electrical Equipment

Since berming has not been used around transformers owned and operated by the TOVCC, and diversionary structures are not feasible at the transformer locations, TOVCC has instead opted to implement the Alternative Requirements to General Secondary Containment under 40 CFR 112.7(k), in the form of a strong contingency plan. The plan is based on routine inspections of the transformers for small leaks that are attended to immediately by placing collection devices and absorbent material to prevent the leak from spreading. Materials covered by the oil are removed as soon as possible and replaced with clean material. In the event of a catastrophic failure of a transformer or breaker, station personnel trained in spill response will be dispatched to the designated transformer with mats to cover the drains so that there will be no discharge to a navigable water. Immediately after taking action to prevent discharge to navigable water, the facility's disposal contractor will be called to clean up the spill. In general, all of the transformers in the substations sit on concrete pads surrounded by gravel. In the event of a release, oil stored in the transformers would infiltrate into the subsurface prior to reaching navigable water.

If a release were to occur at substations located at the Alledonia processing plant at Portal No. 1, oil that did not infiltrate into the subsurface would discharge to a series of retention ponds where oil absorbent booms have been installed to prevent petroleum from entering a navigable waterway. In accordance with the Implementation Schedule provided in **Appendix B**, TOVCC will install spill kits at each transformer substation. This includes all portals and ventilation shafts to satisfy the general secondary containment requirement in providing active measures to prevent petroleum products from reaching a navigable waterway.

Oil Filled Operational Equipment

Since berming has not been used around this oil filled operational equipment and diversionary structures are not feasible at the equipment locations, TOVCC has instead opted to implement the Alternative Requirements to General Secondary Containment under 40 CFR 112.7(k) in the form of a strong contingency plan. The plan is based on routine inspections of the operational equipment for small leaks that are attended to



immediately by placing collection devices and absorbent material to prevent the leak from spreading. Materials covered by the oil are removed as soon as possible and replaced with clean material. In the event of a catastrophic failure of a transformer or breaker, personnel trained in spill response will be dispatched to the designated transformer with mats to cover the drains so that there will be no discharge to a navigable water. Immediately after taking action to prevent discharge to navigable water, the facilities disposal contractor will be called to clean up the spill. In accordance with the Implementation Schedule provided in **Appendix B**, TOVCC will install spill kits adjacent to the oil filled operational equipment.

16.0 112.8 (a) – SPCC REQUIREMENTS FOR ON-SHORE FACILITIES

Meet the general requirements for the Plan listed under 112.7, and the specific discharge prevention and containment procedures listed in this section.

The requirements for section 112.8(a) are met by the implementation of the procedures outlined in this Plan and the Implementation Schedule provided in **Appendix B**.

17.0 112.8(b) – FACILITY DRAINAGE

17.1 112.8(b)(1) – Diked Storage Areas

Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.

Several ASTs at the facility are staged inside of steel containment dikes. **Table 3 – Oil Storage in Section 112.7(a)(3)(i)** provides a list of all oil storage at the facility and a list of single-walled ASTs that contain steel containment dikes. The facility utilizes an outside disposal contractor (Safety Kleen) to pump stormwater that collects in the steel containment dikes. The facility does not discharge stormwater collected in the steel containment dikes to the surface or stormwater retention ponds.

The solcenic lubricant loading area is equipped with an earthen containment sump. The containment sump is equipped with drainage valves that are closed during loading operations. The valves are left open when not loading the solcenic lubricant AST.

17.2 112.8(b)(2) – Drainage Valves

Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c)(3)(ii), (iii), and (iv) of this section.

The facility utilizes an outside disposal contractor (Safety Kleen) to pump stormwater that collects in the steel containment dikes. The facility does not discharge stormwater collected in the steel containment dikes to the surface or stormwater retention ponds. Drainage valves on the steel containment dikes are kept closed at all times.

The solcenic lubricant loading area is equipped with an earthen containment sump. The containment sump is equipped with drainage valves that are closed during loading operations. The valves are left open when not loading the solcenic lubricant AST.

17.3 112.8(b)(3) – Drainage Systems

Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.

Portal No. 1 Processing Plant

The facility utilizes a series of retention ponds and drainage swales to direct surface runoff away from the processing areas. The retention ponds and/or drainage swales discharge to one (1) of five (5) National Pollutant Discharge Elimination System (NPDES) Outfalls (001, 002, 007, 011 and 013). In areas where petroleum products are stored and/or handled, drainage ultimately ends up at Pond 10 (Drawing 3). Stormwater is pumped from Pond 10 to the slurry impoundment which discharges to NPDES Outfall 001. According to the Armstrong Mills USGS 7.5 Minute Quadrangle, NPDES Outfall discharges to an unnamed tributary of Captina Creek.

Portal No. 2

Facility drainage at Portal No. 2 is accomplished through the use of stormwater drainage ditches and swales. Stormwater from parking areas and driveways is directed to the ditches/swales and discharged to the adjacent Anderson Run (Drawing 4). There are no other stormwater drainage structures in use at Portal No. 2.

Drainage patterns/systems for each petroleum storage area is discussed in **Section 5.4.3 – Discharge Drainage Controls** and **Section 6.0 – Spill Predictions**.

17.4 112.8(b)(4) – Additional Drainage Provisions

If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.

There are no additional drainage provisions other than those detailed in Section 17.3 of this Plan.

17.5 112.8(b)(5) – Pump Transfers

Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two “lift” pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in 112.1(b) in case there is an equipment failure or human error at the facility.

There is no stormwater treatment system in place at this facility, therefore Part 112.8(b)(5) is not applicable.

18.0 112.8(c) – BULK STORAGE CONTAINERS

18.1 112.8(c)(1) – Compatibility

Do not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.

The materials of construction for each AST, the 55-gallon drums, the oil-filled electrical equipment, and oil-filled operational equipment are compatible with the product stored and conditions of storage (i.e., pressure, temperature, etc.). Product is transferred into and from the bulk storage tanks through product and fill piping. The AST's system piping is located completely above grade. The exposed piping is visible for inspection. The materials of construction for the product and fill piping are compatible with the transferred product and conditions of transfer (i.e. pressure, temperature, etc.).

The materials of construction for the USTs (steel, double-wall) are compatible with the products stored and conditions of storage (i.e. pressure, temperature, etc.). Product is transferred into and from the USTs through product and fill piping. The UST's system piping is located below and above grade. The materials of construction for the product and fill piping are compatible with the transferred product and conditions of transfer (i.e. pressure, temperature, etc.). The UST systems are constructed of corrosion resistant materials.

Employees are trained in the safe handling of stored substances, including precautions against mixing incompatible materials. Additional tanks, piping and equipment added to the facility are selected based upon compatibility with substances to be handled or stored.

18.2 112.8(c)(2) – Secondary Containment

Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

Refer to section 7.0 for details of additional secondary containment structures for this facility.

18.3 112.8(c)(3) – Rainwater Discharge

Do not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you:

- (i) Normally keep the bypass valve sealed closed.*
- (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in 112.1(b).*
- (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and*
- (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with 122.41(j)(2) and 122.41(m)(3) of this chapter.*

The facility utilizes an outside disposal contractor (Safety Kleen) to pump stormwater that collects in the steel containment dikes. The facility does not discharge stormwater collected in the steel containment dikes to the surface or stormwater retention ponds. Drainage valves on the steel containment dikes are kept closed at all times.

18.4 112.8(c)(4) – Underground Storage Tanks

Protect any completely buried metallic storage tank installed on or after January 10, 1974, from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.

Three (3) 3,000-gallon double-walled steel new motor oil USTs are located at the Diesel Shop. One of the ASTs are kept empty to be utilized as a back-up. The new motor oil from the 3,000-gallon USTs is pumped by an air diaphragm pump to overhead reels in the diesel shop. The USTs and cathodic protection system were inspected in November 2010 and are due for another inspection in November 2013.

An 8,000-gallon double-walled steel diesel UST is located at the raw coal pile. The diesel fuel from the 8,000-gallon UST is pumped to a dispenser and utilized to fuel heavy equipment used at the facility. The UST and cathodic protection system were inspected in November 2010 and are due for another inspection in November 2013.

A 2,000-gallon double-walled steel unleaded gasoline UST is located in front of the main office. The unleaded gasoline from the 2,000-gallon UST is pumped to a dispenser and utilized to fuel facility vehicles. The UST and cathodic protection system were inspected in November 2010 and are due for another inspection in November 2013.

18.5 112.8(c)(5) – Partially Buried Tanks

Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried



and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.

There are no partially buried tanks at this facility, therefore Part 112.8(c)(5) is not applicable.

18.6 112.8(c)(6) – Testing

Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposed of this paragraph.

The AST's are painted to prevent corrosion. The oil-containing equipment is visually inspected weekly and documented monthly by facility personnel. Particular attention is given to weld seams, gaskets, pumps, bolts, hoses, and joints. The immediate areas around the facility are also periodically examined for evidence of oil. A discrepancy found in an area is noted and immediate corrective action taken. Upon completion of the inspection, the inspection document(s) will be signed by the person performing the inspection and a copy of the completed checklist will be attached to this document and/or be kept on file at the facility. Copies of the inspection forms can be found in **Appendix E** of this Plan.

The double-walled ASTs are equipped with an interstitial sensor system to monitor for oil leaks within the space between the inner and outer tanks. The proper operation of this system is checked, inspected and documented on a monthly basis.

Based on these factors and in accordance with the STI-SP001 guidance for factory manufactured ASTs less than or equal to 5,000, weekly visual observations and monthly inspection documentation is sufficient to comply with this section and 112.7(a)(2) [Section 5.3].

In accordance with the STI-SP001 guidance for factory manufactured ASTs greater than 5,000 gallons, weekly visual observations, monthly inspection documentation and a formal external inspection every 20 years is sufficient to comply with this section and 112.7(a)(2) [Section 5.3].

Underground storage tanks (USTs) at the facility are inspected by a certified inspection contractor every three (3) years. The last UST inspection was completed in November 2010 and the next inspection is scheduled for November 2013.

18.7 112.8(c)(7) – Heating Coils

Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

There are no heating coils fitting this definition in use at this facility, therefore Part 112.8(c)(7) is not applicable.

18.8 112.8(c)(8) – Container Design

Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices:

- (i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice.*
- (ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level.*
- (iii) Direct audible or code signal communication between the technician gauging the container and the pumping station.*
- (iv) A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers.*
- (v) You must regularly test liquid level sensing devices to ensure proper operation.*

The ASTs, drums, mobile re-fuelers, and USTs product levels are monitored by direct read tank gauges and/or manually stick read prior to, during, and following transfer operations. It is TOVCC company policy that a facility representative supervise transfer operations to and from the ASTs, drums, mobile re-fueler, and USTs.

18.9 112.8(c)(9) – Effluent Treatment Facilities

Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).

There are no effluent treatment facilities located at TOVCC, therefore 112.8(c)(9) is not applicable.

18.10 112.8(c)(10) – Visible Discharges

Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.

The procedures outlined in Section 7.0 and Section 9.0 account for inspections and repairs of visible discharge areas.

18.11 112.8(c)(11) – Portable Oil Storage Containers

Position or locate mobile or portable oil storage containers to prevent a discharge as described in 112.1(b). You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

55-Gallon Drums

Approximately fifty (50) 55-gallon steel drums (various fuel-oils, motor oils, used oils, lubricating oils, hydraulic oil, transmission fluid, antifreeze, windshield washer fluid and grease) are located in storage sheds and/or within the maintenance shops at the facility. The drums are staged on the concrete floor within the maintenance building or on spill pallets undercover in one (1) of three (3) oil storage sheds. The sheds are 3 sided and the pallets sit on gravel. Secondary containment for the drums in the diesel shop is provided by the building and sealed doorways. There are four (4) floor drains located inside of the diesel shop. Three (3) of the four (4) floor drains have been sealed shut. The fourth drain was converted to a sump and holds approximately 30 gallons of primarily rain water that leaks through the overhead door. An oil boom is placed in the sump to capture any oil that may drain into the sump. Before the sump pump is used to pump the rainwater out of the drain the shop foreman will ensure there is no oil sheen on the water.

Since the 55-gallon drums are stored beneath oil storage sheds or within the maintenance building it is highly unlikely that stormwater would come into contact with the drums or the drum contents.

Mobile Refueler/Lube Truck

The facility utilizes a mobile lube truck (Mobile Refueler #1) to service the heavy machinery in use at the mining operation. The mobile lube truck is equipped with a single-walled, 2,000-gallon diesel AST, a single-walled, 220-gallon motor oil AST, a single-walled, 250-gallon motor oil AST, five (5) single-walled, 120-gallon motor oil ASTs and a single-walled, 60-gallon motor oil AST. Prevention for leaks or spills to discharge to the retention ponds while fueling is accomplished through the use of and spill kits. In accordance with the implementation schedule provided in **Appendix B**, the facility will provide a spill kit on the Refueler/Lube truck.

19.0 112.8(d) – FACILITY TRANSFER OPERATIONS

19.1 112.8(d)(1) – Buried Piping

Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.

Product piping for the three (3) 3,000-gallon, the 8,000-gallon and the 2,000-gallon USTs is underground from the tanks to their respective transfer points. Product piping is equipped with protective wrapping and coating. If a section of buried line is exposed, it will be carefully examined for deterioration and/or corrosion. If corrosion damage is found, additional examination or corrective action will be taken as indicated by the magnitude of the damage.

Piping associated with the smaller ASTs located at TOVCC's Facility is aboveground.

19.2 112.8(d)(2) – Terminal Connections

Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.

Terminal connections and transfer points of oil-containing equipment/containers are capped when not in service or in stand-by mode. In accordance with the Implementation Schedule provided in **Appendix B** the facility will identify, properly clean, and label out-of-service ASTs at the facility. The out-of-service ASTs and mobile lube/refueling truck locations are provided on **Drawing 3 in the Drawings Tab**.

19.3 112.8(d)(3) – Pipe Supports

Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.

The piping associated with the ASTs is constructed with properly designed supports to minimize abrasion and corrosion impacts, and to allow for expansion and contraction.

19.4 112.8(d)(4) – Inspections

Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of

valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.

The piping at this facility is inspected monthly according to the inspection procedures detailed in Section 9.0 of this Plan. Inspection results are noted on the Monthly Spill Prevention Inspection Checklist in **Appendix E**.

19.5 112.8(d)(5) – Warnings

Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.

Exposed aboveground piping at TOVCC's facility is located in areas not subjected to damage by forklifts or vehicles. Concrete bollards are located in strategic areas at the facilities to preclude damage caused by forklifts or vehicles. In accordance with the Implementation Schedule outlined in **Appendix B** the facility will install barriers or place warning signs around ASTs and piping that do not already have proper protection.

DRAWINGS



Montgomeryville, Pennsylvania 18936
215.699.4800 fax 215.699.8315

Drawing 1

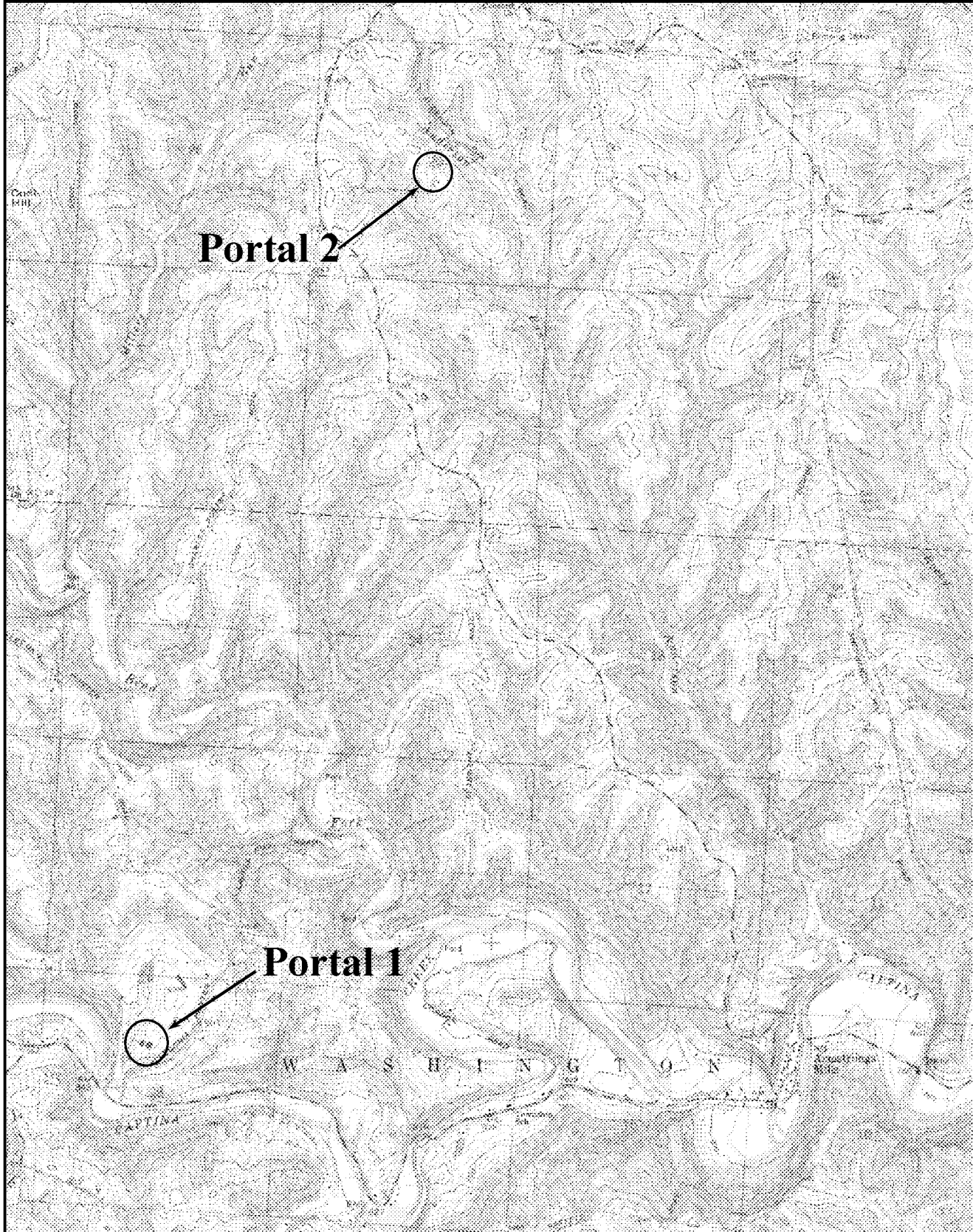
Date:
April 5, 2011

Map Information:
Google Earth

Scale:
As Noted

Site Location Map

The Ohio Valley Coal Company – Powhatan No. 6 Mine
56854 Pleasant Ridge Road
Alledonia, Ohio 43902



ARMSTRONGS MILLS, OHIO

N 24° 00' 00" W 10° 00' 00" E

1960

PHOTO REVISION 1970
AMS 4863 (V. 00) - SERIES V580

SCALE 1:24,000



CONTOUR INTERVAL 20 FEET
DATUM IS MEAN SEA LEVEL



Montgomeryville, Pennsylvania 18936
215.699.4800 fax 215.699.8315

Drawing 2

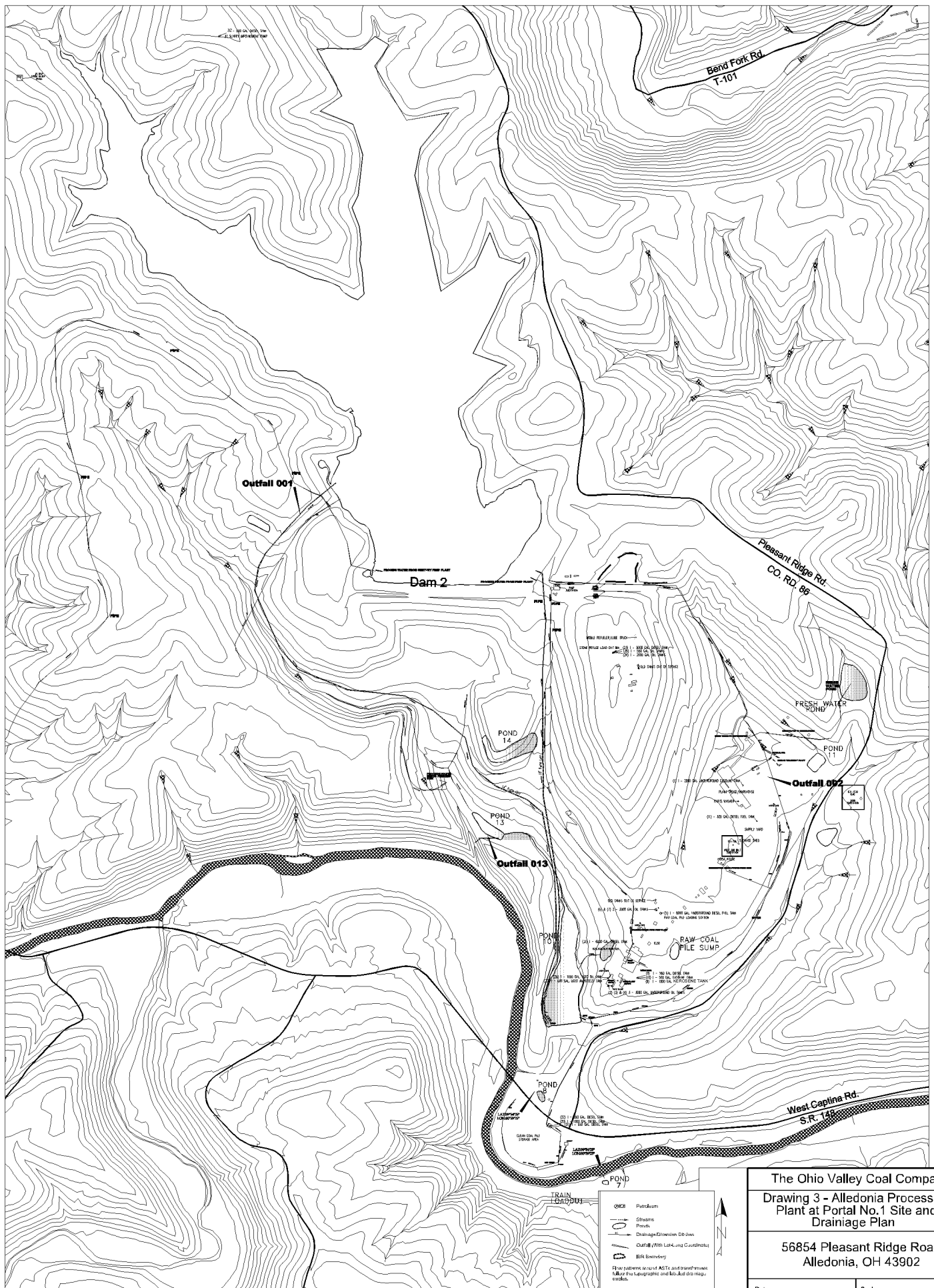
Date:
April 5, 2011

Topographic Map Information:
Armstrong Mills, Ohio

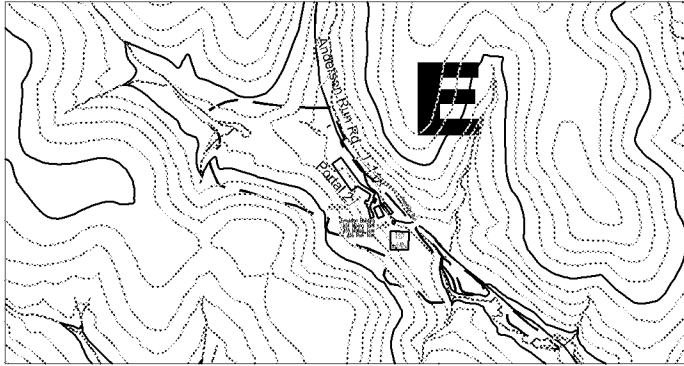
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As Noted

Site Topographic Map

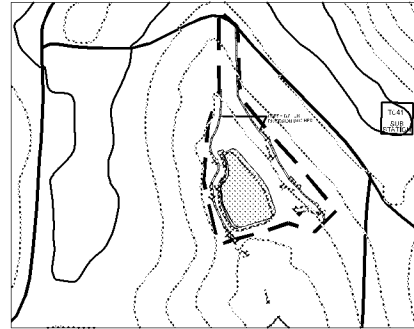
The Ohio Valley Coal Company – Powhatan No. 6 Mine
56854 Pleasant Ridge Road
Alledonia, Ohio 43902



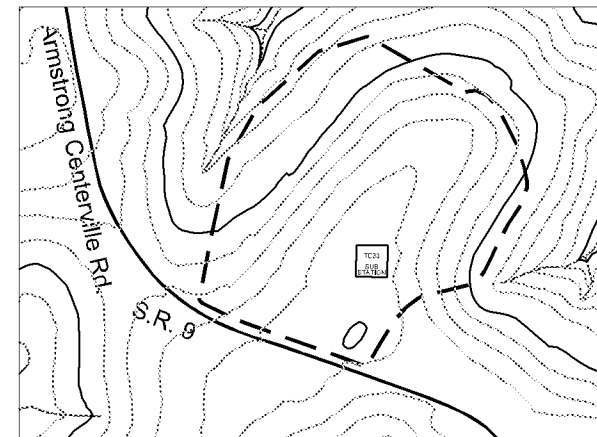
The Ohio Valley Coal Company	
Drawing 3 - Alledonia Processing Plant at Portal No. 1 Site and Drainage Plan	
56854 Pleasant Ridge Road Alledonia, OH 43902	
Date: 04-07-11	Scale: 1" = 300'



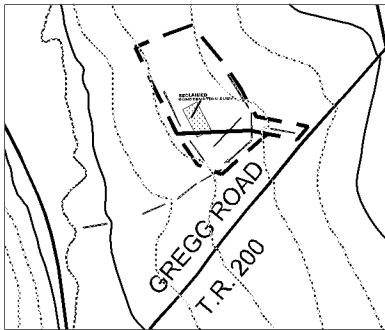
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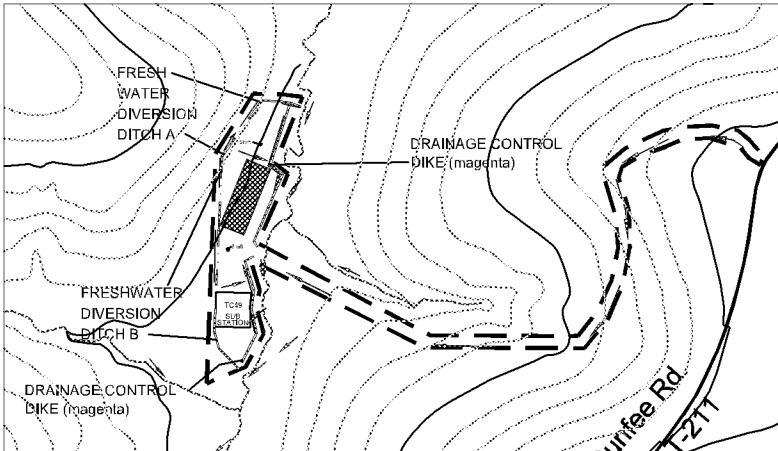
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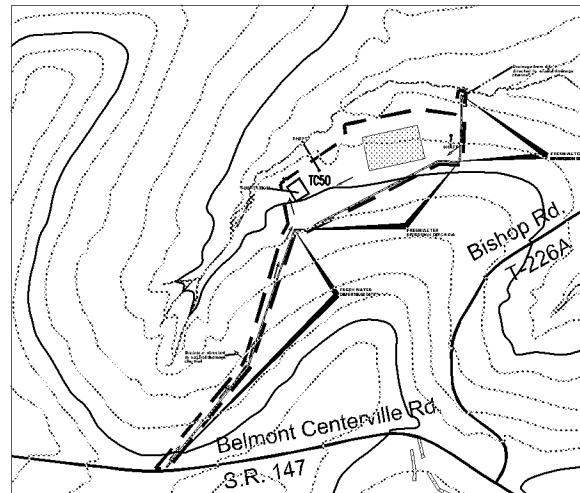
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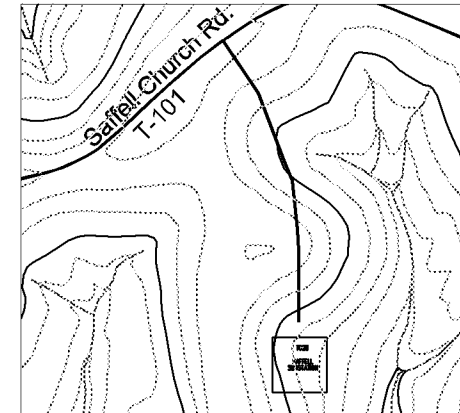
IBR-Q 10west
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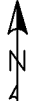
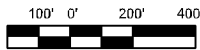
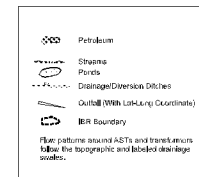
IBR-P 7west
Scale: 1" = 200'



IBR-R 12west
Scale: 1" = 200'



SAFFELL SUBSTATION
Scale: 1" = 200'



The Ohio Valley Coal Company	
Drawing 4	
Portal 2 - Shaft Site - Drainage Map	
56854 Pleasant Ridge Road Allendonia, OH 43902	
Date:	Scale:
04-06-11	1" = 200'

APPENDIX A

**CERTIFICATION OF APPLICABILITY OF
THE SUBSTANTIAL HARM CRITERIA**

APPENDIX A
CERTIFICATION OF APPLICABILITY OF
THE SUBSTANTIAL HARM CRITERIA
(As per 40 CFR 112.20 (f) (1))

Facility Name: **THE OHIO VALLEY COAL COMPANY**

Facility Address: **56854 PLEASANT RIDGE ROAD, ALLEDONIA, OHIO, 43902-9716**

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

YES _____

NO X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

YES _____

NO X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million Gallons and is the facility located at a distance (as calculated using the appropriate formula in 40CFR 112 Appendix C-111 or a comparable formula ¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see 40 CFR 112 Appendix E, Section 10, for availability) and the applicable Area Contingency Plan.

YES _____

NO X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million Gallons and is the facility located at a distance (as calculated using the appropriate formula in 40CFR 112 Appendix C-111 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?

YES _____

NO X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million Gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

YES _____

NO X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete. Based on this information, the determination has been made that a facility response plan as per 40 CFR 112.20 is not required.

SIGNATURE

David Blake

NAME (PLEASE PRINT OR TYPE)

Mine Manager and Superintendent
TITLE

DATE

¹ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

² For the purposes of 40 CFR 112, public drinking water intakes are analogous as described in 40 CFR 143.2 ©.

APPENDIX B

IMPLEMENTATION SCHEDULE

APPENDIX B
THE OHIO VALLEY COAL COMPANY - ALLEDONIA, OHIO
PRELIMINARY IMPLEMENTATION SCHEDULE

This SPCC Plan, prepared for The Ohio Valley Coal Company includes the following Implementation Schedule which outlines the facility upgrades. The completion of these upgrades is necessary in order for the facility to meet the requirements set forth in Sections 112.7 and 112.8 of the SPCC Plan. The schedule lists the upgrade, the corresponding regulation, and an estimated completion date as follows. Additionally, the implementation schedule allows The Ohio Valley Coal Company to certify each upgrade once completed:

Item	Recommended Facility Upgrades	Estimated Completion Date	Action Taken	Completed	Signature
1	Facility will provide adequate secondary containment for the 55 gallon drums throughout the facility by placing the drums undercover and on secondary containment spill pallets to comply with 40 CFR Part 112.7(c) and 112.8(c)(2).	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____
2	Facility will provide spill kits adjacent to all transformer areas/substations (for all shafts and Portal #2), lubricating oil reservoirs, hydraulic oil power packs and parts washers containing petroleum based solvents to comply with 40 CFR Part 112.7(k) - Qualified Oil Filled Operational Equipment.	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____
3	Facility will provide and/or repair tank gauges and interstitial monitors on all of the ASTs to comply with 40 CFR Part 112.8(c)(8) - Container Design.	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____

APPENDIX B
THE OHIO VALLEY COAL COMPANY - ALLEDONIA, OHIO
PRELIMINARY IMPLEMENTATION SCHEDULE

This SPCC Plan, prepared for The Ohio Valley Coal Company includes the following Implementation Schedule which outlines the facility upgrades. The completion of these upgrades is necessary in order for the facility to meet the requirements set forth in Sections 112.7 and 112.8 of the SPCC Plan. The schedule lists the upgrade, the corresponding regulation, and an estimated completion date as follows. Additionally, the implementation schedule allows The Ohio Valley Coal Company to certify each upgrade once completed:

Item	Recommended Facility Upgrades	Estimated Completion Date	Action Taken	Completed	Signature
4	The facility will identify, properly clean, and label out-of-service ASTs. Oil filled operational equipment not in use shall be properly drained and cleaned and marked as out of service if to remain onsite. If the AST's and junk oil filled operational equipment is to remain onsite and not marked as out of service, the facility will provide proper secondary containment to comply with 40 CFR 112.7(c) and 112.7(k).	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____
5	Portal No. 2 - The facility will install and/or implement active measures to meet the general secondary containment requirements to contain a potential release from the delivery tanker truck. The secondary containment will be sufficiently impervious to handle the contents of the tanker truck delivering diesel fuel to the AST to comply with 40 CFR Part 112.7(a)(3)(III) - Discharge Drainage Controls.	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____
6	The facility will install concrete bollards, other type of barrier, and/or warning signs to protect ASTs from vehicular traffic to comply with 40 CFR 112.8(d)(5).	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____

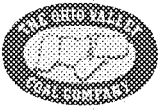
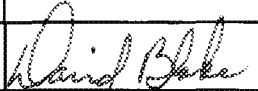
APPENDIX B
THE OHIO VALLEY COAL COMPANY - ALLEDONIA, OHIO
PRELIMINARY IMPLEMENTATION SCHEDULE

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Item	Recommended Facility Upgrades	Estimated Completion Date	Action Taken	Completed	Signature
7	The facility will install/repair check valves and or nozzles on dispensing equipment that is lacking or needs repair to comply with 40 CFR 112.7(g).	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____
8	The facility will implement protocols which require trained facility personnel to be present during the entire loading/unloading operation; or the facility will implement procedures which require the drivers from the fuel-delivery contractor to be properly trained by TOVCC personnel on the facilities fuel-handling procedures.	July 2011		Yes/No	Print Name: _____ Signature: _____ Date: _____

APPENDIX C

TOVCC STANDARD OPERATING PROCEDURES

	The Ohio Valley Coal Company Standard Operating Procedure: Removal of Possible Hazardous Materials from Mine Sites and Facilities	Number:	L-0001
		Original/Revised Date:	February 23, 2011
SOP Owner	Environmental	Approved:	

Purpose:

Emptied chemical totes, 55 gallon drums, buckets, cans and similar containers are property of The Ohio Valley Coal Company even after they are empty. These containers must never be converted for personal use by employees, and any such conversion by an employee shall be considered theft of company property and subject the employee to disciplinary action, up to and including termination.

Illustrations:

The Ohio Valley Coal Company purchases chemicals and petroleum products that are delivered to the mine site in containers that could be hazardous. When these possible hazardous chemicals and petroleum products are removed from their containers, trace amounts of those chemicals or petroleum products remain in these containers. The Ohio Valley Coal Company is responsible for the proper disposal of these empty/partially empty containers. The definition of containers in the SOP includes:

- Totes
- 55 gallon drums
- 5 gallon buckets
- other similar containers.

Intended Audience:

The Ohio Valley Coal Company's management and employees.

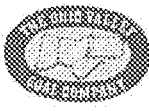
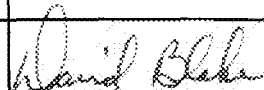
Implementation:

During the annual eight (8) hour refresher training and once a quarter during crew meetings, The Ohio Valley Coal Company's front line managers will review this standard operating procedure.

Immediately no employee may remove a used drum, can, bucket, tote or any other container from the property of The Ohio Valley Coal Company.

Each manager who purchases or utilizes these possible hazardous chemicals or petroleum products at The Ohio Valley Coal Company is responsible for the proper disposal of those containers that held those chemicals and petroleum products.

The manager in who orders and utilizes these chemicals must notify the warehouse in writing when pick-up is needed.

	The Ohio Valley Coal Company Standard Operating Procedure: Oil Contaminated Material Handling	Number:	CWA-0003
		Original/ Revised Date:	March 25, 2011
SOP Owner	Environmental	Approved:	

Purpose:

To prevent oil, diesel, gasoline and similar petroleum products from entering the environment by properly disposing of these liquids in approved bins or containers.

Background History and Illustrations:

Our permits require The Ohio Valley Coal Company to properly dispose of used oil filters and oil contaminated clean up towels, pads, oil booms and other similar materials. These materials cannot be deposited into our general waste dumpsters.

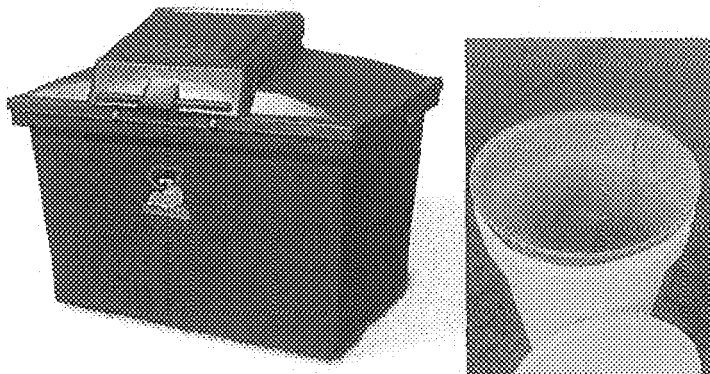
Intended Audience:

The Ohio Valley Coal Company's management and employees.

Implementation:

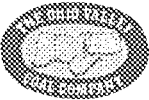
During the annual eight (8) hour refresher training and once a quarter during crew meetings, The Ohio Valley Coal Company's front line managers will review where oil contaminated materials are and where oil contaminated materials need to be placed for proper disposal.

Oil Contaminated Materials Bins ("Blue Dumpsters"), have been provided to place oil contaminated material into. Blue Dumpsters hold approximately two cubic yards of material, equal to six – 55 gallon drums in volume. Yellow thirty (30) gallon plastic drums ("Yellow Drums") are also provided with blue colored bag liners. Small items such as oil contaminated rags and pads are to be placed in the Yellow Drums, when full the top of the bag must be tied together and placed in the Blue Dumpsters. Large or heavy items shall be placed directly into these Blue Dumpsters.



The following materials **MUST** be placed in the bins:

- Drained, used oil filters must be placed directly into the bin, they do not have to be in the blue plastic bags.
 - o The oil filters must have a hole punched in them and drained.

	The Ohio Valley Coal Company Standard Operating Procedure: Oil Contaminated Material Handling	Number:	CWA-0003
		Original/ Revised Date:	March 25, 2011
SOP Owner	Environmental	Approved:	<i>David Blaher</i>

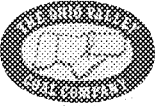

- Oil soaked rags or absorbent pads, oil absorbing sock (booms) and empty plastic quart oil and transmission fluid bottles must be placed in the Yellow Drums.

The following products **MUST NOT** be placed into the bins:

- General trash (Food packaging, soda bottles and cans, etc.)
- Paper, cardboard boxes
- Oil dry
- Scrap steel

Safety Kleen, or other certified petroleum product disposal contractor will take these materials from our facility.

Employees should be trained to always use the appropriate bins to dispose of oil, diesel, gasoline and similar petroleum products, and to alert their managers when these bins are full and need to be picked up and replaced.

	The Ohio Valley Coal Company Standard Operating Procedure: Fueling of Surface Equipment	Number:	CWA-0001
		Original/ Revised Date:	February 23, 2011
SOP Owner	Environmental	Approved:	

Purpose:

To prevent pollution and to reduce wastage of oil, diesel, anti-freeze, gasoline and other similar petroleum products.

Background History and Illustrations:

Our permits require The Ohio Valley Coal Company to clean up any spilled oil, diesel, anti-freeze, gasoline and other similar petroleum products.

Intended Audience:

The Ohio Valley Coal Company's management and surface employees.

Implementation:

During the annual eight (8) hour refresher training and once a quarter during crew meetings, The Ohio Valley Coal Company's front line managers will review spill prevention practices with their crews.

Specifically in the standard operating practice; employees will remain near the fueling nozzle when surface equipment is being fueled by pumps. The nozzles for these pumps must be of the type that automatically shuts off when the receiving tank is full. This will minimize any spills that could occur in the event that the automatic shutoff malfunctions.

After fueling has been completed the nozzles must be placed in holder that prevents any liquid from leaking onto the ground.

It is the duty of the employee who operates a fueling station to report to their supervisor any malfunctioning fueling equipment and any spills.

The Ohio Valley Coal Company provides spill kits at all permanent fueling stations to clean up any spilled oils and fuels, and requires all employees to recognize spills and clean them up using the materials provided immediately upon discovery. Additional spill kits are available in the warehouse.

If a spill is due to employee negligence, disciplinary actions may be taken.

APPENDIX D

**USEPA AND OEPA SPILL NOTIFICATION
AND REPORTING REQUIREMENT**

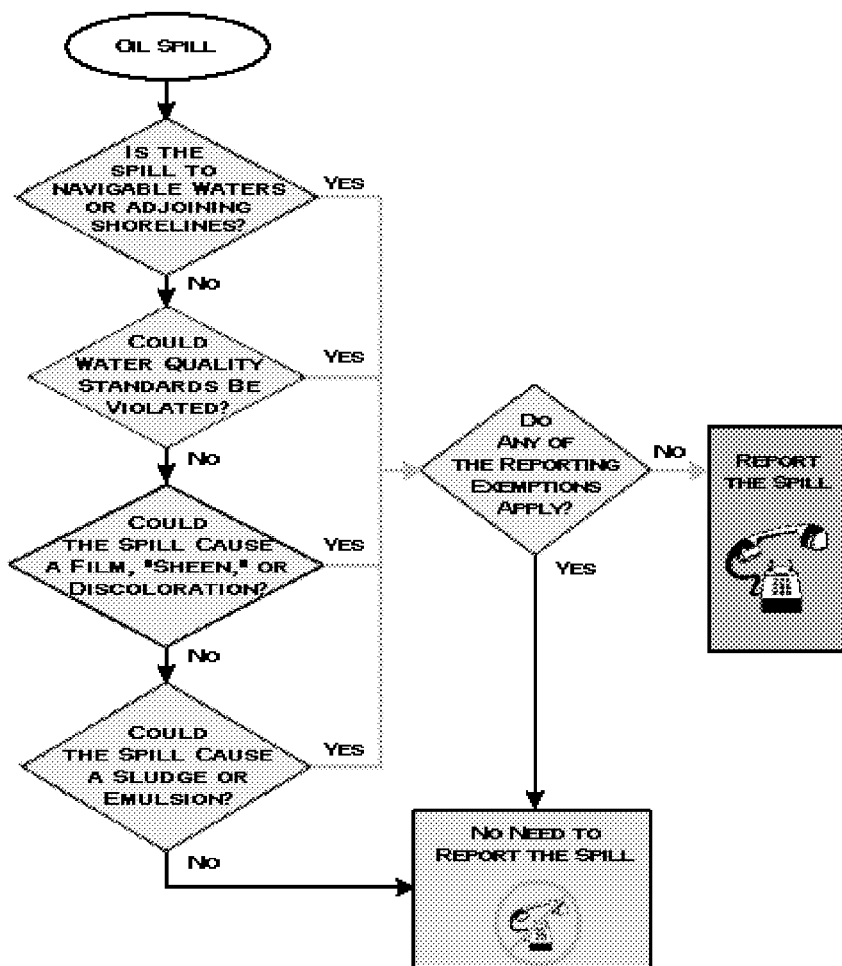
USEPA REPORTABLE INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

EPA has established requirements to report spills to navigable waters or adjoining shorelines. Specifically, EPA requires persons in charge of vessels or facilities that discharge oil in quantities that may be harmful to public health or welfare, or to the environment, to report the spill to the federal government. EPA has determined that discharges of oil in quantities that may be harmful include those that:

- Violate applicable water quality standards (State water quality standards);
- Cause a film or "sheen" upon, or discoloration of the surface of the water or adjoining shorelines; or
- Cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

In addition, the USEPA requires reporting and notification if the facility has a spill of more than 1,000 gallons of oil in a single discharge or more than 42 gallons in each of two discharges in any 12-month period.

The following flow chart identifies when a spill should be reported:



OEPA REPORTABLE INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

The reportable quantities for spills or releases involving a petroleum product (diesel fuel, gasoline, hydraulic fluid, etc.) are:

1. Any amount of petroleum that causes a film or sheen on a waterway.
2. Any spill or release to the environment (not contained on the spiller's property) of 25 gallons or more.

If you are uncertain how much was released, reporting is encouraged. Spills of petroleum products of 25 gallons or more on or adjacent to a public roadway are always reportable. OEPA encourages responders to report petroleum spills of any amount if the spill threatens a waterway, or will enter a waterway or storm sewer in the future due to rain or snowmelt if unaddressed.

The verbal notification to the fire department, Local Emergency Planning Committee (LEPC) and OEPA shall be made within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances. In addition, calls to The National Response Center (NRC) shall be made for those reportable quantity releases involving CERCLA hazardous substances or oil to navigable waters as soon as possible. The National Response Center (NRC) 24-hour number is 1-800-424-8802. The release notification for 24-hour reporting of emergencies in Ohio is 1-800-282-9378. Out of State or if the 800 number does not work, call: 614-224-0946

After the release or discharge a written follow-up emergency notice must be submitted within 30 days to the Ohio EPA, Emergency Response Section and the local planning committee of the planning district(s) in which the release or discharge occurred. If the release was from a vessel, then the report is sent only to the SERC. This follow-up emergency notice is your company's opportunity to explain in its own words the circumstances and actions relating to the release of pollutants to the environment. Your written emergency notice should follow the question sequence as indicated in the attached document. If any of the questions are not applicable to your incident, indicate N/A (Not Applicable) for that item.

The written emergency notice must be submitted within 30 days of the release or discharge to:

Ohio EPA
Lazarus Government Center
Attention: ER Records Management
50 West Town Street, Suite 700
P. O. Box 1049
Columbus, Ohio 43215-1049

Belmont County Emergency
Management Agency
68329 Bannock Road
St. Clairsville, OH 43950



The statute provides that if significant additional information regarding the mandatory or voluntary information submitted becomes known during the period one (1) year after the release or discharge, the owner or operator shall submit to the LEPC and the OEPA an updated written notice within three (3) days after learning of the additional information.

If this is the second oil spill release at this location within a 12-month period or a release of over 1,000 gallons which has reached water, then you must submit a copy of your Spill Prevention Control and Countermeasure Plan (SPCC) to the USEPA Regional Administrator and to OEPA within 60 days from the time of the discharge as required by 40 CFR 112.4. Your SPCC plan may be submitted with your response to the 30-day written follow-up report.



APPENDIX E

FORMS AND TRAINING LOGS

APPENDIX E
TELEPHONE SPILL INCIDENT REPORT FORM

Incident date:

Time:

Report date:

Time:

Facility name:

Facility address:

Person reporting:

Phone no.:

Supervisor:

Phone no.:

Product spilled:

Approx. amount:

Date stopped:

Time:

Spill from or suspected from a leaking AST or AST piping?

Spill contained on property?

If not, did spill enter sewers, pipes, ditches, etc.?

If not, did spill enter a body of water?

Nearest body of water or body of water spill entered?

Will spill clean-up be accomplished within 24-hours?

Agencies/contractors contacted:

Complete description of spill:



APPENDIX E
RELEASE NOTIFICATION FORM

1. Duration of release:

2. Release was into: air groundwater surface water sewer

3. Anticipated acute or chronic health risks:

4. Advice on medical attention for exposed individuals (if appropriate):

5. Proper precautions to take (including evacuation if appropriate):

6. Name and phone number of person(s) contacted:

Name: _____	Phone: _____
Name: _____	Phone: _____
Name: _____	Phone: _____

7. Emergency response actions taken:

8. Weather conditions:

9. Response personnel at scene:



**APPENDIX E
PERSONNEL TRAINING RECORD**

I hereby certify that I have received training in the operation of this facility, including, but not limited to, the operation of emergency equipment and the procedures to follow in the event of an emergency or oil spill.

DATE	TYPE OF TRAINING	SIGNATURE AND TITLE

I hereby certify that I have taken part in an annual review of the SPCC Plan and training required to operate this facility:

DATE	SIGNATURE AND TITLE



APPENDIX E
DISCHARGE PREVENTION BRIEFING LOG

LOCATION: _____

DATE OF BRIEFING: _____

BRIEFING CONDUCTED BY: _____

The following items were discussed at the meeting:

(Check Items Discussed)

- ___ Spill Prevention Control and Countermeasure (SPCC) Plan
- ___ Applicable pollution control laws, rules and regulations
- ___ Spill events or failures at this or other facilities
- ___ Operation and maintenance of equipment to prevent oil spills
- ___ Areas at the facility where spills might occur, directions of possible flow, and estimated quantities for each type of occurrence
- ___ Spill reporting procedures
- ___ Other _____

TERMINAL OPERATING PERSONNEL IN ATTENDANCE:

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Raw Coal Pile (2x3,000-gal Oil ASTs, 1x8,000-gal Diesel UST)		
Evidence of Spill/Leaks at loading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Plant Septic Area (1x1,000-gal Kerosene AST, 1x500-gal Gasoline AST, 1x560-gal Diesel AST)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Supply Yard (1x520-gal Diesel AST)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Clean Coal Pile (1x1,000-gal Diesel AST, 2x550-gal Oil ASTs)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Stone Refuse Loading Bin (1x5,000-gal Diesel AST, 1x2,000-gal Oil AST, 1x550-gal Oil AST)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Diesel Shop (1x1,000-gal Used Oil AST, 1x500-gal Used Antifreeze AST, 3x3,000-gal USTs, Parts Washer)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Prep Plant (1x6,000-gal Diesel AST)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
#2 Slurry Impoundment (500-gal Diesel AST)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Office Entrance and Warehouse (Gasoline UST, Parts Washer)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Hoist House (Hydraulic Oil Reservoir)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Mobile Re-fueler/Lube Truck		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
Container Storage Area #1 - Shop		
Overall Integrity/Condition of Drums		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Area Around Drums		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose (if applicable)		
Joints, valves, etc.		
Container Storage Area #2 – Old Refuse Bin		
Overall Integrity/Condition of Drums		
Area Around Drums		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose (if applicable)		
Joints, valves, etc.		
Container Storage Area #3 – Lower Supply Yard		
Overall Integrity/Condition of Drums		
Area Around Drums		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose (if applicable)		
Joints, valves, etc.		
Transformers – Main Sub Station		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – Hoist and Belt Sub Station		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Joints, valves, etc.		
Transformers – Prep Plant		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers - #2 Dam		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – Saffell Ridge		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – Anderson Run		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – Cool Hill		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – Route 9		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – Thermal Dryer		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – 7 West		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Transformers – 10 West		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		

APPENDIX F

MONTHLY SPILL PREVENTION INSPECTION CHECKLIST THE OHIO VALLEY COAL COMPANY POWHATAN MINE NO. 6 56854 PLEASANT RIDGE ROAD ALLEDONIA, OH 43902

Date: _____ **Inspector:** _____

Item to Check	OK?	Comment
Transformers – 12 West		
Evidence of Spill/Leaks		
Overall Integrity/Condition of Transformer		
Area Around Transformers		
Overall Piping Condition		
Joints, valves, etc.		
Portal No. 2 (8,000-gal Solcenic Lubricant, 2x3,200-gal Water/Solcenic, 150-gal Diesel Generator)		
Evidence of Spill/Leaks at Unloading Area		
Overall Integrity/Condition of Tank		
Level Gauges (if applicable)		
Interstitial Monitoring System Operating		
Area Around Tanks		
Overall Piping Condition		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose		
Joints, valves, etc.		
General Items		
Spill Kit Carts		
Drain Cover Kits		
Stormwater Control Systems		
Fire Suppression System		
Condition of Dispensers (if applicable)		
Condition of Dispenser Hose (if applicable)		
Joints, valves, etc.		
Ponds		
Drainage Swales		